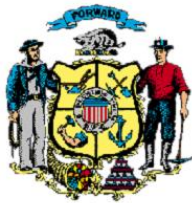


Wisconsin's WIA State Plan Modification

2007 - 2009

Governor Jim Doyle



Wisconsin Department of
Workforce Development



WIA TITLE I STATE PLAN MODIFICATION 2007- 2009

Table of State Plan Contents

I.	Summary: Governor's Visions and Goals	1
II.	Governor's Key Workforce Investment Priorities	2
III.	State Governance Structure	3
IV.	Economic and Labor Market Analysis.....	9
V.	Overarching State Strategies.....	23
VI.	State Policies and Requirements.....	29
VII.	One-Stop System.....	31
VIII.	Administration and Oversight of Local System	32
IX.	Service Delivery: Approaches.....	46
X.	State Administration:.....	81
XI.	Assurances	92
	Acronyms.....	95
	Attachments.....	98
	ETA Regional Administrator: Attachment A.....	99
	Program Administration Designees and Plan Signature: Attachment B	100
	Organizational Chart: Attachment C	101
	Member List of the Governor's Council on Workforce Investment: Attachment D.....	102
	Council on Workforce Investments: Attachment E	103
	Workforce Development Areas Boundaries Map: Attachment F	108
	GROW Grant Project Regions: Attachment G	109
	Monitoring Guides: Attachment H.....	110
	Complaints/Grievances and Appeals: Attachment I	155
	Wisconsin's Job Center Service Standards: Attachment J	163
	Administrator's Memo Series: Attachment K	169
	Limited English Proficiency Plan: Attachment L	172
	Veterans: Attachment M	184
	Proposed Performance Measures: Attachment N.....	195

Updated Elements

1. Plan Development Process: 1(a) Involvement of the Governor and State Board (b) Description of State Board Collaboration **Updated**
2. Plan Development Process: 2 Description of how the State handled public comments **Updated**
 - I. Summary: Governor's Visions and Goals **Updated**
 - I. A. Economic Development Strategies and Goals
 - I. B. Vision for Maximizing Resources
 - I. C. Vision for Skilled Workforce Education and Training
 - I. D. Vision for Collaboration on Workforce Challenges
 - I. E. Vision for Education and Training of Youth
 - II. Governor's Key Workforce Investment Priorities **Updated**
 - III. State Governance Structure:
 - III. A. Organization of State Agencies
 - A. 1. Organizational Chart
 - A. 2. Interrelationship of Agencies
 - III. B. State Workforce Investment Board: **Updated**
 - B. 1. Structure of State Board
 - B. 2. Organizations and Entities Represented
 - B. 3. Process Used to Identify Council Members
 - B. 4. How Membership Effectuates Vision
 - B. 5. Description of Functionality
 - B. 6. Public Access to Meetings and Information
 - B. 7. Conflict of Interest
 - B. 8. State Resources
 - III. C. Structure/Process for Collaboration: **Updated**
 - C. 1. Improvements to Operational Collaboration
 - C. 2. Lines of Communication to Implement Vision
 - C. 3. Mechanisms for Information Sharing
 - C. 4. Entities to Effectuate Youth Vision
 - IV. Economic and Labor Market Analysis: **Updated**
 - IV. A. Economic Base by Industry
 - IV. B. Growth Industries and Occupations
 - IV. C. In-Demand Industries and Occupations
 - IV. D. Employment Critical to State's Economy
 - IV. E. Skill Needs
 - IV. F. Demographics of Labor Pool
 - IV. G. Labor Pool Migration
 - IV. H. Skills Gaps of Labor Pool
 - IV. I. Workforce Development Issues
 - IV. J. Priorities for Economic Health and Growth

- V. Overarching State Strategies **Updated**
 - V. A. Leveraging Resources
 - V. B. Strategies to Address National Strategic Direction
 - V. C. Strategies for High Growth, High Demand Occupations
 - V. D. Sustained Strategic Partnerships
 - V. E. Strategies for Training in High Growth, High Demand Occupations
 - V. F. Strategies of Small Businesses
 - V. G. Reserve Funds for Statewide Activities of Governor's Vision and National Strategic Direction
 - V. H. Strategies for Collaboration to Serve Youth
 - V. I. Impediments to Achieve Goals and Strategies
 - V. J. Waivers and Workflex **Updated**
- VI. State Policies and Requirements: **Updated**
 - VI. A. Common Data Collection and Reporting Processes
 - VI. B. Administrative Resources
 - VI. C. Universal Access
 - VI. D. Demand-driven System
 - VI. E. Apprenticeship and Job Corps
- VII. One-Stop System: **Updated**
 - VII. A. Quality and Competencies
 - VII. B. Maximum Integration for Business and Individual Customers
 - VII. C. One-Stop System
 - VII. D. Infrastructure Costs
 - VII. E. Reserve Funds for Statewide Activities
 - VII. F. Full Spectrum of Assets
- VIII. Administration and Oversight of Local System:
 - VIII. A. Local Area Designations
 - A. 1. Workforce Development Areas and Timeframes
 - A. 2. Process of Designation **Updated**
 - A. 3. Appeals Process **Updated**
 - VIII. B. Criteria for Local Board Membership
 - VIII. C. Capacity Building of Local Boards **Updated**
 - VIII. D. Local Planning Process **Updated**
 - D. 1. Oversight
 - D. 2. Consistency with Performance Goals and Strategic Direction
 - VIII. E. Regional Planning: **Updated**
 - E. 1. Intra/Inter-State and Performance Measures
 - E. 2. Designations and Activities
 - E. 3. Roles
 - VIII. F. Allocation Formulae:
 - F. 1. Methods and Factors
 - F. 2. Equitability
 - F. 3. Dislocated Worker Formula
 - F. 4. State Board Involvement **Updated**
 - VIII. G. Provider Selection Policies:
 - G. 1. Policies, Procedures and Performance **Updated**
 - G. 2. Solicitations
 - G. 3. Maintenance of State Training Provider List **Updated**

- G. 4. Appeal Process
- G. 5. State Grants and Contracts Processes **Updated**
- G. 6. Local criteria for Youth Activities **Updated**
- VIII. H. One-Stop Policies:
 - H. 1. Coordination of Partners and Wagner-Peyser Funds **Updated**
 - H. 2. Improvements and Technical Assistance **Updated**
 - H. 3. Additional Mandatory Partners
- VIII. I. Oversight/Monitoring Process **Updated**
- VIII. J. Grievance Procedures
- VIII. K. Policies and Procedures for Effective Local Systems: **Updated**
 - K. 1. State Guidelines for Selection of One-Stop Providers by Local Boards
 - K. 2. Impasse Procedures
 - K. 3. Local Board as Service Provider
 - K. 4. Training Providers Performance Information
 - K. 5. Reallocation
 - K. 6. Transfer Funds Authority
 - K. 7. Special Needs Populations
 - K. 8. Sixth Youth Eligibility Criterion

IX. Service Delivery: Approaches

- IX. A. One-Stop Service Delivery Strategies: **Updated**
 - A. 1. Service Provision by Each Partner
 - A. 2. Youth Formula Programs
 - A. 3. Minimum Service Delivery Requirements
 - A. 4. Tools and Products
 - A. 5. Models/Approaches
- IX. B. Workforce Information: **Updated**
 - B. 1. Integration at State and Local
 - B. 2. Dissemination of Information
 - B. 3. Core Products and Services Plan
 - B. 4. Information Products and Tools
- IX. C. Adults and Dislocated Workers: **Updated**
 - C. 1. Core Services:
 - C. 1. a Universal Access
 - C. 1. b Three-tiered Service Delivery for Labor Exchange Services
 - C. 1. c Integrated Resources **Updated**
 - C. 2. Intensive Services- State Strategies
 - C. 3. Training Services- State Strategies
 - C. 3. a Governor's Vision for Increasing Training Access and Opportunities
 - C. 3. b Individual Training Accounts:
 - i. Policy Direction **Updated**
 - ii. Innovative Training Strategies **Updated**
 - iii. Commitment to Fund High-Growth, High-Demand Occupations **Updated**
 - iv. Limiting ITAs
 - v. Apprenticeship **Updated**
 - vi. Religious Activities
 - C. 3. c Eligible Training Provider List
 - C. 3. d On-the-job Training and Customized Training
 - i. Governor's Vision for Increased Opportunities **Updated**
 - ii. Operational and Funding Issues **Updated**

- C. 4. Service to Specific Populations: **Updated**
 - C. 4. a Strategies to Meet Needs
 - C. 4. b Remployment Services
 - C. 4. c Unemployment Insurance Work Test
 - C. 4. d Integration and Alignment of Dislocated Worker Services
 - C. 4. e Collaboration with business/industry/education to Overcome Barriers
 - C. 4. f Full Array of Services to Individuals with Disabilities
 - C. 4. g Veteran's Services
 - C. 4. h Limited English Proficiency
 - C. 4. i Migrant and Seasonal Farm Workers
 - C. 5. Priority of Service:
 - C. 5. a Procedures and Criteria
 - C. 5. b Jobs for Veterans Act **Updated**
 - IX. D. Rapid Response [1- 7] **Updated**
 - IX. E. Youth: **Updated**
 - E. 1. Strategies, Requirements and Coordination **Updated**
 - E. 2. Job Corps **Updated**
 - E. 3. Reserve Funds for Statewide activities **Updated**
 - E. 3. a Utilizing Funds to Promote Coordination
 - E. 3. b Cross-cutting Models
 - E. 3. c New Models for Alternative Education **Updated**
 - E. 3. d Demand-Driven Models
 - E. 3. e Program Design **Updated**
 - IX. F. Business Services:
 - F. 1. Determination of Employer Needs **Updated**
 - F. 2. Integration of Business Services and Wagner-Peyser **Updated**
 - F. 3. Streamlining Federal Tax Credit Programs **Updated**
 - IX. G. Innovative Service Delivery Strategies:
 - G. 1. Improvement Efforts **Updated**
 - G. 2. PRA [Not Applicable]
 - IX. H. Strategies for Faith-Based and Community Organizations **Updated**
- X. State Administration:
 - X. A. Technology Infrastructure and Management Information System **Updated**
 - X. B. Reserve Funds for Statewide Activities **Updated**
 - X. C. Waivers and Workflex Authority **Updated: Waiver Continuation Request for Subsequent Policy**
 - X. D. Performance Management and Accountability: **Updated**
 - D. 1. Performance Accountability System
 - D. 2. Targeted Groups
 - D. 3. Additional Outcomes
 - D. 4. Common Data System and Reporting Processes
 - D. 5. State Board Collaboration on Continuous Improvement
 - D. 6. State and Local Performance Evaluation
 - D. 7. Preparation for New Reporting Requirements
 - D. 8. Proposed Performance Level for Each Measure
 - X. E. Administrative Provisions **Updated**
 - E. 1. Appeal Process
 - E. 2. Non-Discrimination Compliance

XI. Assurances

- 1. Fiscal Controls**
- 2. Two-year Certifications**
- 3. Equitable Distribution of Funds**
- 4. Veterans**
- 5. Local Board Certification**
- 6. Confidentiality**
- 7. Non-Union Activity**
- 8. Methods of Administration**
- 9. Collection and Maintenance of Data**
- 10. Grant Requirements**
- 11. State Employment Security Administration Certification**
- 12. Wagner-Peyser Funds for Veteran's Services**
- 13. Wagner-Peyser Activities**
- 14. MSFW Requirements**
- 15. Development of Plan with Partners**
- 16. Non-discrimination and Equal Opportunity Provisions**
- 17. Expenditure of Funds**

1. Plan Development Process:

1. (a) Involvement of the Governor and State Board

Wisconsin's Governor Jim Doyle was recently re-elected to his second term and as such as embarked on an ambitious new agenda that has workforce and economic development at the heart of his plan. In September of 2006, he released his vision for "Jobs for the Future" and in 2007 with his State of the State address in January and Budget Address in February he has provided a road map for the state's workforce priorities. To achieve this agenda he has reappointed Secretary Roberta Gassman to continue her leadership of the Department of Workforce Development (DWD). Governor Doyle will soon be appointing a new Chair of the Council on Workforce Investment (CWI) due to the recent resignation of the chair of Wisconsin's state workforce board. Guidance on this two-year plan was obtained from the Governor's vision and workforce agenda and from the direction of the CWI over the past two years.

1. (b) Description of State Board Collaboration

The 2006 and 2007 CWI meetings contained key actions that will guide our workforce system direction in the coming years. The meeting and the key actions that took place are listed below and details can be found at www.wi-cwi.org.

- March 27, 2007
 - Overview of state budget initiatives
 - Presentation of draft Workforce Investment Act (WIA) State Plan
 - Update on Joyce Foundation Regional Industry Skills Education (RISE) project
- December 2006
 - Presentation by Governor Doyle's staff on Jobs for the Future
 - Presentation on 2006 year in review and looking ahead to 2007
 - Overview of recently awarded Joyce Foundation Shifting Gears grant for \$1 million to support the RISE effort to build a career pathway model within a regional and sector-based strategy
- September 2006
 - Announcement of second year of Growing Regional Opportunities in Wisconsin (GROW) Regional grants to support regional workforce and economic development partnerships (\$500k to seven regions)
 - Presentation on the Southeast WI Regional Workforce Alliance/Milwaukee seven regional economic growth partnership – originally funded by the CWI GROW grant program and has since been awarded a Workforce Innovations in Regional Economic Development (WIRED) second Generation grant
 - Presentation of the CWI project to provide Regional Metrics to support the seven GROW regions funded for a second year
 - Endorsement of the Manufacturing Skills Standards Certification (MSSC) system in Wisconsin and approval to provide funding in the amount of \$100,000 to support activities to connect the MSSC to the workforce system
- June 2006
 - Announcement of three CWI Innovations grants funded at \$100,000 each to implement pilot projects for innovation service delivery
 - Computerized Numerical Control (CNC) Bootcamp to fast track CNC operators to meet business needs
 - Virtual Job Center to develop IT based service delivery in rural settings
 - Distance Learning to delivery training options to remote locations
 - Presentation from the Center on Adult Experiential Learning in Life-Long Learning Accounts
- March 2006

- Approved funding for second year of GROW grants to support workforce and regional economic development
- Recommendations accepted on one-stop system improvements that include more efforts to improve coordination and identify sustained infrastructure support and also to increase leadership and coordination specifically in the Milwaukee workforce system

2. Plan Development Process - Description of how the state handled public comments

The extensive public participation described above helped shape the development of the Plan's draft modifications. On March 27, 2007, the CWI's agenda included the Plan, and the official public review and comment period commenced. Business representatives, members of the labor community, chief elected officials and other workforce development system partners were notified of this 30-day review period with a link to the full draft document. A statewide umbrella organization representing non-profit organizations endorsed the modifications, and supported continuation of the Skills Enhancement Program. There were no additional comments; therefore, no revisions were warranted after the review period ended.

I. Summary: Governor's Visions and Goals

I. A. Economic Development Strategies and Goals

Building on the *Grow Wisconsin* agenda of his first term, Governor Doyle will now focus even more on workforce challenges with his Jobs for the Future initiative that contains numerous actions based on three key areas:

- Investing in manufacturing and high tech industries such as biotechnology and bio-fuels that will produce tomorrow's jobs for tomorrow's workers;
- Raising standards in our schools and preparing our workforce for the jobs of tomorrow, and
- Building partnership between businesses and schools so that our kids are trained for the high tech job market.

Many of the actions in this initiative are directly related to workforce development and some will be funded with WIA discretionary funding to support and achieve high wage, high growth jobs. Specific projects will be described later in this state plan.

I. B. Vision for Maximizing and Leveraging Resources

Regional alignment of workforce development, economic development, education, business and labor will drive much of the agenda in the coming two years and will be a key strategy for maximizing and leveraging resources. Funding from Department of Workforce Development (DWD)/CWI and the Department of Commerce (Commerce) has already been provided to support these efforts and additional investments are expected as these regional partnerships mature.

Specifically related to Jobs for the Future, various resources will be tapped that will help align various state and federal resources, such as the United State (US) Department of Labor (DOL) WIA and US Commerce funds for Manufacturing Extension Partnerships, with state funds to support cutting edge opportunities such as stem cell research, renewable fuels markets, and post-secondary education efforts to grow a new generation of entrepreneurs.

I. C. Vision for Skilled Workforce Education and Training

Governor Doyle's vision is focused on both preparing our youth and upgrading the skills of our current workforce. A major budget initiative with Jobs for the Future will increase funding of the Worker Advancement Training grants through our technical college system from \$2 million to \$8 million that will help train 36,000 workers in over 300 businesses. In addition, Wisconsin was recently awarded one of only three grants from the Midwestern based Joyce Foundation to build a career pathway model to ensure that low skilled adults have the opportunities to increase their skills and wages.

I. D. Vision for Collaboration on Workforce Challenges

Jobs for the Future builds on *Grow Wisconsin's* foundation of partnerships and collaboration in addressing the state's education, workforce development and economic development needs. This foundation emphasizes innovative regional partnerships with business to identify skill needs and strategies for addressing those needs. The state CWI recognized in early 2005 that regional partnerships were the strategy to support and has since provided almost \$1 million in WIA funds to support seven GROW regions, one of which was recently awarded a second generation WIRED grant.

I. E. Vision for Education and Training of Youth

Two of the three main themes within Jobs for the Future are focused at preparing our youth for the workplace of tomorrow. They are: 1) building partnerships between businesses and schools so that our kids are trained for the high tech job market, and 2) raising standards in our schools

and preparing our workforce for the jobs of tomorrow. Two of the specific efforts that Governor Doyle is supporting are:

- Youth Apprenticeship Program – this work-based learning program provides a unique opportunity to explore a career and gain paid work experience with a local business. Governor Doyle is proposing to double the funding in this program from \$1.1 million to \$2.2 million over the biennium.
- Project Lead the Way – this nationally recognized pre-engineering program has been implemented in over 100 schools in Wisconsin and will ensure that Wisconsin youth have exposure to the advanced manufacturing opportunities. A small investment of WIA funding has been made in partnership with Carl Perkins funding, private foundation funding and efforts to build more connections to the workforce system are underway.
- Wisconsin Covenant - Governor Doyle has partnered with the University of Wisconsin System, Wisconsin Technical College System (WTCS), Wisconsin Department of Public Instruction (DPI), Wisconsin Association of Independent Colleges and Universities, as well as Wisconsin Businesses and the philanthropic community to implement the Wisconsin Covenant. The Covenant guarantees eighth graders who sign a pledge stating they will maintain a B average, stay out of trouble and participate in their community, a spot in either the University of Wisconsin System, the WTCS, or at one of the state's 20 private, nonprofit independent colleges. The Covenant is a partnership that promotes access to, success in, and affordability of higher education. The State of Wisconsin and the Wisconsin Covenant community will make sure there is a place for each Covenant Scholar in higher education and a financial aid package to cover tuition and fees for each Covenant Scholar as needed.
- Homeless and Runaway Youth Services - To deal with the increasing number of homeless and runaway youth, DWD has partnered with the Wisconsin Association for Homeless and Runaway Services (WAHRS). WAHRS has 24 homeless and runaway programs located throughout the state. Each quarter, DWD staff attends the WAHRS state meetings and do a presentation on the WIA youth program. Also, DWD staff has met with WIA youth program staff in each Workforce Development Area (WDA) and presented information about the WAHRS. As a result of these presentations, WAHRS program staffs are referring many of the youth they serve to WDAs and the WDAs are referring some WIA youth to WAHRS.
- Financial Literacy - Financial Literacy is one of the major factors in keeping Wisconsin's economy vibrant. To address this issue, Governor Doyle created the Governor's Council on Financial Literacy in June 2005. The Council is charged with measurably improving the financial literacy of Wisconsin's citizens, especially youth. One of the key areas the Council is focusing on is formal education in schools. DWD has partnered with the Department of Financial Institutions Office of Youth Financial Literacy to provide technical assistance and training for K–12 public and private schools, as well as, WIA youth programs throughout the state. The first thing the Council did was to create Money Smart Week Wisconsin. This initiative has the backing of financial leaders across Wisconsin and Federal Reserve Banks of both Chicago and Minneapolis. Money Smart Week included workshops, seminars, programs, events and activities that helped families, students, homeowners, businesses, employees and other community members become more familiar with Financial Literacy.

II. Governor's Key Workforce Investment Priorities

Key Strategic Priorities

The key strategic priorities for the coming year are to increase the skills of our workforce in order to meet business needs and grow our regional economies. The two main approaches to this are:

- Continued and increased support for the GROW grants to align workforce, economic development and education to grow our states' regional economies; and

- Implementation of our RISE project, funded by the Joyce Foundation to build a career pathway model, with bridge programming to ensure access to lower skilled adults, and integrate into our GROW regional efforts.

Key Industry Priorities

Within the strategic priorities, we will also target key industries through focused investments in skill development.

- **Manufacturing**
 - Wisconsin's employment in manufacturing remains second in the nation, behind only Indiana. Our global competitiveness will depend on our ability to build an advanced manufacturing environment that has no rival. To this end, under Governor Doyle's leadership, there are several investments in advanced manufacturing that will be made in the next two years. They will be described in detail later in this plan but will include efforts such as launching the MSSC system, investing through an Emerging Skills Industry Partnership (ESIP), and building career pathways in manufacturing through our RISE project. Milwaukee Area Technical College was recently awarded a US DOL Community Based Job Training (CBJT) grant in manufacturing that will also help support MSSC efforts.
- **Biotechnology**
 - Wisconsin is poised to be a leader in biotechnology and medical devices, with the stem cell research, growing biotech industry and long history in medical devices manufacturing. One of our technical colleges was recently awarded a US DOL CBJT grant for biotechnology, a project developed in partnership with the area workforce board. The ESIP project will also target biotech as one of three sectors to invest in skill development.
- **Bio-fuels**
 - Governor Doyle has set a goal for Wisconsin to capture 10% of the renewable fuels market and has launched an aggressive effort to invest in this area. The ESIP grant program to be launched in the spring of 2007 will target this area for workforce skill development. This will complement other efforts to encourage research, product development, and commercialization efforts.
- **Healthcare**
 - Governor Doyle has made healthcare a top priority for his second term and healthcare workforce will continue to be a focus for DWD. In 2003, DWD convened the Select Committee on Healthcare Workforce Development and has recently released the second annual healthcare workforce report that highlights labor market projections and numerous healthcare initiatives. Further details will be provided in later sections of this plan.
- **Construction**
 - A skilled and adequate skilled trade workforce is a growing concern in Wisconsin, a state that is aging faster than the national average. Training projects in road building have been funded by our Department of Transportation (DOT) and additional efforts have been funded in the Southeast Wisconsin region to train more women and minorities in construction. A special project between DWD and the Department of Corrections (DOC) to train ex-offenders is also being funded for a second year.

III. State Governance Structure

III. A. Organization of State Agencies

III. A. 1. Organizational Chart

(Attachment C : State Departments and Interrelationships.)

III. A. 2. Interrelationship of Agencies

As head of the executive branch, Governor Doyle appoints the heads of the Cabinet agencies (DWD, Department of Health and Family Services (DHFS), Commerce, DOC, etc.). At the Cabinet level, the Governor has an expectation of continual interrelationships on matters related to advancing the state's workforce and economy. DPI is headed by the State Superintendent of Public Instruction, a constitutional officer who is elected for a term of four years. The Technical College System Board is the coordinating agency for the Technical College system. The 13 member Technical College System Board includes nine members appointed by the Governor and a technical college system student; the remaining three members are the Secretary of DWD, the State Superintendent of Public Instruction, and a UW System Board of Regents representative. More detail about the organization of Wisconsin state government can be found in the *2005-2006 Wisconsin Blue Book* at: <http://www.legis.state.wi.us/lrb/bb/>.

As stated earlier, a State Interagency (staff) Team is now meeting to augment the work of the CWI through other state entities that have responsibility in workforce and economic development issues. This team will address CWI recommendations, and develop implementation strategies pertinent to their agencies as well as design common goals across agencies.

III. B. State Workforce Investment Board

III. B. 1. Structure of State Board

Wisconsin's CWI was appointed by Governor Doyle in February 2004. The CWI meets as a full council on a quarterly basis and has \$500,000 of WIA funds allocated for special projects. The CWI established three standing Committees that are:

- **The Workforce Strategies Committee** is charged with identifying existing and future regional workforce and skill needs, supporting effective regional strategies to align the supply of qualified workers with the emerging demand, and developing recommendations to advance a high-wage, high-growth economy.
- **The Workforce System Development Committee** is charged with advancing state and regional success by targeting resources in key growth industries in different regions of the state and promoting a comprehensive, effective and accountable workforce system to deliver education and training services that contributes to achieving the Governor's vision and goals for growing Wisconsin's economy.
- **The Executive Committee** provides oversight and leadership to the CWI and consists of the co-chairs of both standing committee, the President of the Wisconsin Technical College System, the Secretary's of two state departments, DWD and Commerce, and the CWI Chair and Vice-Chair. Attached to the Executive Committee are two specialized sub-committees:
 - The WIA Dislocated Worker Committee to advise DWD on state special response funding and dislocated worker program policy; and
 - An advisory committee for a new U.S. Department of Health and Human Services Medicaid Infrastructure Grant for Wisconsin's Bridges to Work program to assist people with disabilities to enter the workforce without losing medical insurance.

III. B. 2. Organizations and Entities Represented

CWI members represent the required partners in WIA as well as other vital stakeholders in Wisconsin's employment and training arena. Membership includes: a

majority of business representatives who are chief executive officers or who have optimum policy-making/hiring authority, labor organization representatives, state agency representatives, members of the state Legislature, and representatives of state and local educational agencies, non-profit organizations, and government. See Attachment D: List of CWI Members

III. B. 3. Process Used to Identify CWI Members

The process used to identify council members was multi-faceted. Initial appointments were identified by the Governor's Office during the gubernatorial process of appointments to numerous state councils and committees. Business representatives were specifically sought from growth industry sectors such as technology and health care, two important industries that had not been well represented on past councils. To ensure good geographic distribution, workforce board directors were asked to suggest names from areas and sectors that were not yet represented. The state also looked for some overlap of state council members who served on local boards to enhance the connection between the state and local areas. As a result, ten of the 49 CWI members also serve on local boards. Efforts were also made to appoint economic development representatives to build more linkages between economic development and workforce development. Diversity issues were also considered for both geography and racial representation to be reflective of Wisconsin's demographics.

Since 2004, a few members have moved on to other opportunities and replacements have been sought to maintain the geographic and sector diversity.

III. B. 4. How Membership Effectuates Vision

As a large and diverse body, the CWI is able to broadly advise the Governor's economic and workforce development goals. Among the key benefits of Wisconsin's diverse council are:

- Increased ability to identify and gain in-depth understanding of the skill needs and challenges faced by a range of industry sectors and businesses in the state, particularly the high-wage emerging industries such as biotechnology, bio-fuels, advanced manufacturing and the industries experiencing significant skill shortages such as healthcare.
- Increased opportunities to develop more productive working relationships between the state and local workforce investment systems and to encourage state and local partnerships between workforce development and economic development efforts. This will help support the regional GROW grant and help develop Wisconsin regions to support DOL's WIRED direction.
- Increased opportunities for state agencies to align workforce, education, and economic development policies, strategies, and resources across state agencies and the programs they administer. This alignment will improve opportunities to target and leverage resources to better advance the Governor's goals and improve the workforce delivery system on a regional basis with key partners.

III. B. 5. Description of Functionality

In forming the CWI, the Governor gave it responsibilities that go beyond the specific responsibilities for the WIA Title IB program outlined in federal law. These expanded responsibilities are articulated in the Governor's charge to the CWI and in the Executive Order, which formally authorizes the council in Wisconsin and has remained in place since 2004.

In establishing the CWI, the Governor charged it with the following responsibilities:

- Promote the use of economic and labor market information to ensure evidence based policy recommendations to guide the state's broad workforce development system;
- Recommend policies to strategically target state training and education resources;
- Foster and support public-private partnerships and intergovernmental cooperation and coordination in the building of Wisconsin's workforce;
- Identify initiatives that invest in Wisconsin's workforce and establish measures to monitor progress towards achieving objectives;
- Function as the federally required WIA State Council to ensure that funds are used as required by federal law, to support the workforce goals of the state, and to disperse dislocated workers grants.

Executive Order #88 incorporates and expands upon the Governor's charge to the Council and provides additional guidance in two areas:

- It directs the CWI to not only advise the Governor on workforce development strategy and policy, but to undertake research and other activities to assist the Governor in enhancing the operation and performance of workforce programs in the state; and
- It directs the CWI to provide direction and oversight to the Wisconsin Forward Award to advance high performance workplaces and other initiatives to support a skilled workforce.

The CWI carries out these functions primarily through its standing committees formed to study issues and develop strategies for advancing the state's workforce investment system.

III. B. 6. Public Access to Meetings and Information

(Attachment E: CWI By-Laws, Article 4.2.)

The CWI is subject to state open meetings requirements (Wis Stat. ss 19.81-19.98). Open meeting requirements are specified in the Council's By-Laws. All meetings are announced at least 24 hours before a meeting, and generally several days prior to a meeting. To ensure open meeting requirements are met, meetings of the full CWI and its committees are published on the DWD public notice web page. This is the method that DWD uses to inform the news media and the public in general about all meetings of councils and committees for which DWD is responsible. In addition, CWI and committee meetings are published on the CWI's website (www.wi-cwi.org). The site provides a mechanism for interested individuals to be notified whenever a meeting announcement, meeting-related materials, and other CWI information are published on the CWI website.

All CWI meetings, including committee meetings, are in locations that are physically accessible to people with disabilities. In addition, people with special needs such as an interpreter or written materials in an alternative format may contact DWD staff for assistance. Those needing assistance in hearing for teleconferences are directed to the Wisconsin Telecommunications Relay System at 711 to request assistance.

III. B. 7. Conflict of Interest

CWI members are state public officials as defined by Wis. Stat. ss 19.42 and are therefore subject to state prohibitions on conflicts of interest as specified in Wis Stat.

ss 19.46. Under this statute, conflict of interest prohibitions include, but are not limited, to:

- Taking any official action substantially affecting a matter in which the official, a member of his/her immediate family, or an organization with which the official is associated has a substantial financial interest; and
- Using his/her office or position in a way that produces or assists in the production of a substantial benefit, direct or indirect, for the official, one or more members of the official's immediate family either separately or together, or an organization with which the official is associated.

This provision is included in the CWI's by-laws (Article 2.4), which all CWI members receive. The CWI's staff (See III.B.8.) provide technical assistance and monitor CWI actions to ensure that CWI members are in compliance with the conflict of interest statute.

III. B. 8. State Resources

The CWI is staffed by policy and administrative staff from DWD's Division of Workforce Solutions (DWS). The CWI Liaison to the DWD and CWI staff director are located in the DWD/DWS/Office of Economic Initiatives. No DWD staff is devoted exclusively to the CWI but have council support duties as a part of their positions. Total staff support is estimated to be approximately 3.5 full-time equivalents when the time devoted to CWI activities is combined across all staff involved.

In addition to staff support, the DWD provides the CWI \$20,000 in WIA set-aside funds each year for the costs of meetings and materials. This includes the costs of quarterly full CWI meetings as well as committee meetings, which may occur more frequently. Since 2004, the CWI has been allocated \$500,000 in WIA set-aside funds for special projects initiated by the CWI to advance its goals and objectives. In Program Year (PY) 2007, CWI will again be allocated \$500,000.

III. C. Structure/Process for Collaboration

III. C. 1. Improvements to Operational Collaboration

DWD periodically convenes a State Interagency Team (SIT) comprised of top executives of each of the state agencies represented on the CWI. The purpose of the SIT is to ensure that the state agencies involved on the CWI, both Cabinet, non-Cabinet, and K-16+ institutions, have a forum to discuss and reach consensus on collaborative approaches to advancing workforce investment issues, identifying and addressing barriers to collaboration, and assisting the CWI in carrying out its advisory role to the Governor. Among the issues the SIT will address in the coming two years are:

- Updating the inventory of state workforce investment programs;
- Joint planning on workforce related programs;
- Implementation of the Joyce Foundation RISE project;
- Integration for RISE with the GROW Regional grants; and
- Collaborative new and ongoing grant opportunities and review teams to enable the state to leverage local resources.

DWD also convenes the quarterly Select Committee on Healthcare Workforce Development, a 30 member group of education, workforce, government, industry, and

labor leaders concerned with developing a skilled and adequate healthcare workforce. DWD Healthcare staff participate in numerous healthcare related committees and workgroups.

DWD/CWI continues to participate as a key partner in planning and implementing various initiatives and programs initiated by other state agencies. Examples include:

- The DHFS Medicaid Infrastructure Grant Advisory Group, which has developed a strategic plan to improve the service delivery system for people with disabilities,
- The Commerce's Wisconsin Development Finance Board, which recommends funding for state economic development programs.
- The WTCS Advanced Manufacturing committee and related network for the MSSC project.

III. C. 2. Lines of Communication to Implement Vision

All of the state agencies with responsibility for advancing the Governor's workforce development strategies are members of the CWI, which meets quarterly. The state agencies represented are: DWD, Commerce, DOC, Health and Family Services, Veterans Affairs and DPI; the State Technical College System Board; and the University of Wisconsin-Extension. Ten of the CWI members are also members of local workforce boards will helps ensure state local communication.

In addition, the CWI has established a website (<http://www.wi-cwi.org/>) on which full CWI and committee meeting announcements, agenda related materials, and minutes are posted. As noted above, the website enables interested individuals to be notified whenever meeting announcements and materials are posted on the website.

III. C. 3. Mechanisms for Information Sharing Between State Agencies/State Board and Local Boards/Areas

In addition to the local board member appointments and the CWI website, the CWI also regularly hears about current initiatives or workforce issues. Workforce Development Board (WDB) Directors are linked as advisors to the CWI committees and the committees have also engaged in efforts to obtain information from the local workforce system.

The DWD also has a number of vehicles for sharing information about current issues, policies and state guidance with its state and local partners, including boards and service providers. Among these are:

- Financial support to and attendance at the Wisconsin Workforce Development Association and the Wisconsin Association of Job Training Executives (WAJTE), both of which provide opportunities for dialogue between DWD and local WDB chairs, local elected officials and WDB Executive Directors;
- Policy and program guidance through Administrator's memos, various in-depth guides (e.g., Workforce Programs Guide, Automated System Support for Employment and Training (ASSET) Guide, Financial Management Guide, Performance Standards Technical Assistance Guides, etc.), all of which are available to partners and staff on the Internet;
- Ongoing state/local staff advisory groups and work groups, including the ASSET Users Group; and
- Technical assistance and training, including Workforce Development Roundtables held for new and experienced local job center staff and managers, WIA adult,

dislocated workers, youth program staff and managers, and Trade Adjustment Assistance Program staff and managers, WIA New Employee Orientations, and other activities incorporated into the annual DWD Technical Assistance and Training (TAT) plan, such as web-based training on WIA performance measures for new and experienced program staff.

III. C. 4. Entities to Effectuate Youth Vision

The CWI contains representation from the state DPI and is regularly attended by the DPI Director of Career and Technical Education. DPI convenes a Career Cluster Committee that includes a wide range of organizations that are involved with career education. Wisconsin also has a Policy Council that guides the development of WISCareers. DWD, as the workforce agency is represented on these bodies.

Wisconsin has a PK-16 council that meets regularly to share information and develop joint strategies to serve young people in the state. They recently convene a business roundtable that included state businesses and other groups to gather input on education needs to support the states' businesses.

Most recently, Governor Doyle has proposed a new state department that would be called the Department of Children and Families and would include Temporary Assistance for Needy Families (TANF), Child Care, Child Support and other related programs that serve low income, low skilled families in Wisconsin. This effort will allow increased coordination or wrap-around services to the state's neediest children and families. This effort is in part an outgrowth of an National Governors Association (NGA) sponsored Service Integration project that has been underway for the past few years in Wisconsin.

At the local level, WDB youth councils and Youth School to Work Consortia Coordinators are the primary mechanisms for guiding local youth program services. The WDB youth councils in particular represent a broad spectrum of organizations working on youth development issues. The WDBs use the Youth Councils as a primary vehicle for ensuring dialogue and building collaborative approaches to addressing the needs of youth in their areas. The Youth School to Work Consortia Coordinators are the primary vehicle for bringing youth apprenticeship, tech prep, and other youth work-based educational activities to the table in these collaborative efforts. The Department will continue to work with the WDBs to connect youth, including youth most in need, to high quality education, training and employment opportunities.

IV. Economic and Labor Market Analysis

IV. A. Economic Base by Industry

Wisconsin has a very diverse industry mix.

Industries	Total Jobs
Natural Resources and Mining	4,300
Construction	135,300
Manufacturing	507,000
Durable Goods	317,800
Nondurable Goods	189,200
Trade	432,900

Wholesale Trade	119,200
Retail Trade	313,700
Transportation Warehousing and Utilities	106,200
Information	49,100
Financial Activities	158,900
Professional and Business Services	267,300
Educational Services	52,200
Health Care and Social Assistance	345,300
Leisure and Hospitality	265,100
Other Services, exc Public	137,500
Government	407,600
Local Government	274,900
State Government	103,600
Federal Government	29,200
Total Nonfarm	2,868,700

Wisconsin has the second highest percentage of manufacturing jobs per its total job market in the United States. Within manufacturing, Wisconsin has extraordinary strength in wood and lumber products, fabricated metals, machinery, electrical equipment and appliances, computer and electronic products, transportation equipment, food products, paper manufacturing, printing, and plastics and rubber products. It has a very strong and growing health services industry. It has a very strong post-secondary education industry – both private and public. It has a vibrant and growing leisure and hospitality industry.

IV. B. Growth Industries and Occupations

Growth Industries:

During the 2005-2007 period, Wisconsin's employment is expected to grow 2.0% with the addition of 59,900 jobs. Over the longer term period of 2004-2014, employment is projected to grow 11.5% and add 347,600 new jobs.

The 30 industries (at the 3-digit North America Industry Classification System (NAICS) level) anticipated to add the most jobs in the short- and long-term are outlined in the following tables.

In the short-term, almost all (98%) of Wisconsin's new job creation will occur among the 30 industries listed. The top ten industries alone are expected to generate 72% of the new jobs. Similarly, in the long-term, 93% of Wisconsin's new job creation will occur among the group of 30 industries, with the top ten contributing to 69% of the state's employment growth.

Twenty-four industries are common to both projection periods. In both time frames, health care, retail and wholesale trade, professional and business services, finance and insurance, construction, and leisure and hospitality related industries dominate. The new jobs in these industries will primarily be due to anticipated population growth, the aging of Wisconsin's population, new business creation, and business outsourcing.

The most notable difference between the short and long-term outlooks is in the number of manufacturing-related industries adding large numbers of new jobs. In the short-term five manufacturing related industries make the top 30 list, while in the long-term there is only one manufacturing industry. In the short-term manufacturing is expected to have a net gain of 700 jobs. In the long-term, a net loss of 6,900 jobs is expected.

Thirty Industries Adding the Most New Jobs, 2005-2007				
Industry Title	Estimated Employment			
	2005	2007	Change	Percent Change
Educational Services, Including State and Local Government	262,020	270,080	8,060	3.08%
Food Services and Drinking Places	189,950	196,330	6,380	3.36%
Ambulatory Health Care Services	102,360	108,190	5,830	5.70%
Administrative and Support Services	123,620	129,400	5,780	4.68%
Social Assistance	64,320	68,710	4,390	6.83%
Specialty Trade Contractors	84,020	87,940	3,920	4.67%
Hospitals, Including State and Local Government	109,780	113,280	3,500	3.19%
Merchant Wholesalers, Durable Goods	66,670	69,030	2,360	3.54%
Professional, Scientific, and Technical Services	91,280	92,940	1,660	1.82%
Nursing and Residential Care Facilities	68,840	70,280	1,440	2.09%
General Merchandise Stores	61,610	62,920	1,310	2.13%
Local Government, Excluding Education and Hospitals	127,630	128,910	1,280	1.00%
Accommodation	31,960	33,090	1,130	3.54%
Construction of Buildings	31,910	33,040	1,130	3.54%
Religious, Grantmaking, Civic, Professional, and Similar Organizations	87,470	88,540	1,070	1.22%
Merchant Wholesalers, Nondurable Goods	45,280	46,320	1,040	2.30%
Management of Companies and Enterprises	40,980	41,880	900	2.20%
Truck Transportation	48,200	49,090	890	1.85%
Computer and Electronic Product Manufacturing	23,940	24,730	790	3.30%
Personal and Laundry Services	26,350	27,060	710	2.69%
Amusement, Gambling, and Recreation Industries	26,730	27,340	610	2.28%
Repair and Maintenance	21,440	22,000	560	2.61%
Publishing Industries	19,260	19,780	520	2.70%
Machinery Manufacturing	69,040	69,520	480	0.70%
Plastics and Rubber Products Manufacturing	32,880	33,360	480	1.46%
Fabricated Metal Product Manufacturing	72,290	72,750	460	0.64%
Nonstore Retailers	21,190	21,640	450	2.12%
Warehousing and Storage	11,420	11,870	450	3.94%
Wood Product Manufacturing	26,270	26,710	440	1.67%
Real Estate	18,710	19,150	440	2.35%

Thirty Industries Adding the Most New Jobs, 2004-2014				
Industry Title	Estimated Employment			
	2004	2014	Change	Percent Change
Educational Services, Including State and Local Government	260,670	297,700	37,030	14.2%
Ambulatory Health Care Services	99,480	135,700	36,220	36.4%
Administrative and Support Services	118,130	149,690	31,560	26.7%
Food Services and Drinking Places	185,410	215,000	29,590	16.0%
Hospitals, Including State and Local Government	108,570	133,200	24,630	22.7%
Social Assistance	60,400	79,300	18,900	31.3%
Professional, Scientific, and Technical Services	89,500	108,000	18,500	20.7%
Specialty Trade Contractors	81,660	98,000	16,340	20.0%
Nursing and Residential Care Facilities	68,870	84,800	15,930	23.1%
Religious, Grantmaking, Civic, Professional, and Similar Organizations	87,800	97,600	9,800	11.2%
Merchant Wholesalers, Durable Goods	64,210	72,490	8,280	12.9%
Insurance Carriers and Related Activities	65,400	73,480	8,080	12.4%
Local Government, Excluding Education and Hospitals	129,720	136,000	6,280	4.8%
Management of Companies and Enterprises	39,830	45,800	5,970	15.0%
Truck Transportation	46,390	51,910	5,520	11.9%
Construction of Buildings	31,520	36,700	5,180	16.4%
Accommodation	30,720	35,800	5,080	16.5%
Nonstore Retailers	22,950	27,630	4,680	20.4%
Credit Intermediation and Related Activities	54,060	57,930	3,870	7.2%
General Merchandise Stores	62,020	65,600	3,580	5.8%
Motor Vehicle and Parts Dealers	39,020	42,600	3,580	9.2%
Building Material and Garden Equipment and Supplies Dealers	28,220	31,500	3,280	11.6%
Transit and Ground Passenger Transport	13,740	16,960	3,220	23.4%
Real Estate	18,360	21,420	3,060	16.7%
Warehousing and Storage	11,060	14,030	2,970	26.9%
Merchant Wholesalers, Nondurable Goods	44,820	47,770	2,950	6.6%
Publishing Industries	19,120	22,020	2,900	15.2%
Amusement, Gambling, and Recreation Industries	26,010	28,800	2,790	10.7%
Transportation Equipment Manufacturing	36,580	39,200	2,620	7.2%
Personal and Laundry Services	26,070	28,640	2,570	9.9%

Declining Industries:

In the short-term there are 21 industries expected to lose jobs, while in the long-term there are 25 industries. (See the following tables.) In the short-term, nine of the declining industries are in manufacturing. These manufacturing industries account for 57% of total short-term job losses. In the long-term, 14 of the industries are in manufacturing and make up 81% of the job losses.

In the short-term, federal and state government are projected to lose jobs, while local government is anticipated to add jobs. In the long-term all levels of government are expected to add jobs.

Industries with Declining Employment, 2005-2007				
Industry Title	Estimated Employment			
	2005	2007	Change	Percent Change
Paper Manufacturing	37,560	36,160	(1,400)	-3.73%
Electrical Equipment, Appliance, and Component Manufacturing	24,330	23,800	(530)	-2.18%
Gasoline Stations	22,780	22,400	(380)	-1.67%
State Government, Excluding Education and Hospitals	34,080	33,720	(360)	-1.06%
Telecommunications	13,260	12,910	(350)	-2.64%
Printing and Related Support Activities	32,650	32,320	(330)	-1.01%
Utilities	11,470	11,150	(320)	-2.79%
Credit Intermediation and Related Activities	54,390	54,150	(240)	-0.44%
				-
Apparel Manufacturing	1,500	1,330	(170)	11.33%
Primary Metal Manufacturing	20,430	20,270	(160)	-0.78%
Textile Mills	1,880	1,720	(160)	-8.51%
Postal Service	14,510	14,410	(100)	-0.69%
Unpaid Family Workers	2,250	2,160	(90)	-4.00%
Furniture and Related Product Manufacturing	16,850	16,780	(70)	-0.42%
Private Households	6,510	6,440	(70)	-1.08%
Clothing and Clothing Accessories Stores	19,370	19,320	(50)	-0.26%
Federal Government Employment, excluding postal service employment	14,760	14,710	(50)	-0.34%
Broadcasting (except Internet)	4,950	4,900	(50)	-1.01%
Rail Transportation	3,320	3,270	(50)	-1.51%
Leather and Allied Product Manufacturing	1,390	1,370	(20)	-1.44%
Textile Product Mills	2,100	2,090	(10)	-0.48%

Industries with Declining Employment, 2004-2014				
Industry Title	Estimated Employment			
	2004	2014	Change	Percent Change
Machinery Manufacturing	68,310	63,100	(5,210)	-7.6%
Paper Manufacturing	38,500	35,100	(3,400)	-8.8%
Electrical Equipment, Appliance, and Component Manufacturing	24,570	21,800	(2,770)	-11.3%
Telecommunications	13,630	12,230	(1,400)	-10.3%
Miscellaneous Manufacturing	16,120	14,760	(1,360)	-8.4%
Gasoline Stations	23,290	22,130	(1,160)	-5.0%
Primary Metal Manufacturing	20,280	19,200	(1,080)	-5.3%
Furniture and Related Product Manufacturing	16,870	15,800	(1,070)	-6.3%
Apparel Manufacturing	1,590	750	(840)	-52.8%
Textile Mills	1,760	970	(790)	-44.9%
Private Households	6,270	5,710	(560)	-8.9%
Utilities	11,570	11,100	(470)	-4.1%
Nonmetallic Mineral Product Manufacturing	11,040	10,640	(400)	-3.6%
Textile Product Mills	2,130	1,740	(390)	-18.3%
Leather and Allied Product Manufacturing	1,400	1,120	(280)	-20.0%
Computer and Electronic Product Manufacturing	22,550	22,300	(250)	-1.1%
Broadcasting (except Internet)	4,910	4,760	(150)	-3.1%
Printing and Related Support Activities	33,210	33,100	(110)	-0.3%
Postal Service	14,580	14,470	(110)	-0.8%
Rail Transportation	3,190	3,120	(70)	-2.2%
Petroleum and Coal Products Manufacturing	370	340	(30)	-8.1%
Pipeline Transportation	210	200	(10)	-4.8%
Also declining, but data not shown in order to protect employer confidentiality				
Forestry and Logging	*	*	*	*
Mining (except Oil and Gas)	*	*	*	*
Monetary Authorities - Central Bank	*	*	*	*

Growth Occupations:

The 30 occupations projected to add the most new jobs during 2005-2007 and 2004-2014 are illustrated in the tables that follow. Registered nurses are at the top in both the short and long-term.

Twenty-six occupations are common to both outlooks. These occupations are scattered across several major occupational groups with no one group dominating the lists. There is only one production occupation, team assemblers, that makes the lists.

Appearing on the short- but not long-term list are preschool teachers, secondary teachers, bartenders, and hairdressers/hairstylists/cosmetologists. Listed in the long- but not short-term are general office clerks, computer system analysts, food preparation workers, and medical assistants.

Thirty Occupations Adding the Most New Jobs, 2005-2007				
	Estimated Employment			
Occupation Title	2005	2007	Change	Percent Change
Registered Nurses	48,900	51,320	2,420	4.95%
Janitors & Cleaners, Except Maids & Housekeeping Cleaners	57,520	59,280	1,760	3.06%
Combined Food Preparation & Serving Workers, Including Fast Food	54,050	55,760	1,710	3.16%
Retail Salespersons	82,440	84,010	1,570	1.90%
Waiters & Waitresses	47,670	49,150	1,480	3.10%
Personal & Home Care Aides	22,350	23,810	1,460	6.53%
Carpenters	34,160	35,490	1,330	3.89%
Customer Service Reps	46,100	47,420	1,320	2.86%
Truck Drivers, Heavy & Tractor-Trailer	55,060	56,330	1,270	2.31%
Home Health Aides	14,370	15,450	1,080	7.52%
Sales Reps, Wholesale & Manufacturing, Except Technical & Scientific Products	34,380	35,410	1,030	3.00%
Team Assemblers	47,390	48,430	1,040	2.19%
Teacher Assistants	26,940	27,820	880	3.27%
Elementary School Teachers, Except Special Education	31,690	32,560	870	2.75%
Child Care Workers	22,250	22,990	740	3.33%
Receptionists & Information Clerks	26,110	26,850	740	2.83%
Nursing Aides, Orderlies, & Attendants	38,290	38,980	690	1.80%
General & Operations Managers	28,690	29,360	670	2.34%
Maids & Housekeeping Cleaners	26,250	26,890	640	2.44%
Landscaping & Groundskeeping Workers	20,690	21,300	610	2.95%
Truck Drivers, Light or Delivery Services	24,480	25,100	620	2.53%
Secondary School Teachers, Except Special & Vocational Education	26,680	27,300	620	2.32%
Computer Software Engineers, Applications	8,160	8,760	600	7.35%
Accountants & Auditors	22,960	23,560	600	2.61%
Bartenders	23,540	24,120	580	2.46%
Laborers & Freight, Stock, & Material Movers, Hand	54,140	54,720	580	1.07%
Maintenance & Repair Workers, General	27,080	27,640	560	2.07%
Executive Secretaries & Administrative Assistants	32,270	32,830	560	1.74%
Hairdressers, Hairstylists, & Cosmetologists	19,580	20,110	530	2.71%
Preschool Teachers, Except Special Education	8,690	9,190	500	5.75%

Thirty Occupations Adding the Most New Jobs, 2004-2014				
	Estimated Employment			
Occupational Title	2004	2014	Change	Percent Change
Registered Nurses	48,410	64,420	16,010	33.1%
Retail Salespersons	82,030	93,140	11,110	13.5%
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	56,740	66,250	9,510	16.8%
Customer Service Representatives	46,010	54,790	8,780	19.1%
Combined Food Preparation and Serving Workers, Including Fast Food	52,980	61,340	8,360	15.8%
Personal and Home Care Aides	21,260	29,460	8,200	38.6%
Home Health Aides	13,730	20,790	7,060	51.4%
Truck Drivers, Heavy and Tractor-Trailer	53,490	60,470	6,980	13.0%
Waiters and Waitresses	46,470	53,390	6,920	14.9%
Nursing Aides, Orderlies, and Attendants	38,630	45,320	6,690	17.3%
Carpenters	33,580	39,620	6,040	18.0%
Receptionists and Information Clerks	25,640	30,200	4,560	17.8%
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	33,740	38,080	4,340	12.9%
Teacher Assistants	26,770	30,980	4,210	15.7%
Accountants and Auditors	22,690	26,830	4,140	18.2%
General and Operations Managers	28,280	32,330	4,050	14.3%
Elementary School Teachers, Except Special Education	31,520	35,550	4,030	12.8%
Team Assemblers	46,540	50,430	3,890	8.4%
Executive Secretaries and Administrative Assistants	31,840	35,500	3,660	11.5%
Computer Software Engineers, Applications	7,960	11,610	3,650	45.9%
Maids and Housekeeping Cleaners	25,630	29,220	3,590	14.0%
Child Care Workers	21,840	25,310	3,470	15.9%
Truck Drivers, Light or Delivery Services	24,350	27,790	3,440	14.1%
Landscaping and Groundskeeping Workers	20,310	23,610	3,300	16.2%
Maintenance and Repair Workers, General	26,860	29,960	3,100	11.5%
Office Clerks, General	48,170	51,250	3,080	6.4%
Computer Systems Analysts	11,280	14,110	2,830	25.1%
Laborers and Freight, Stock, and Material Movers, Hand	53,510	56,330	2,820	5.3%
Food Preparation Workers	15,700	18,480	2,780	17.7%
Medical Assistants	5,890	8,640	2,750	46.7%

Declining Occupations:

The thirty occupations with largest declines in employment over the short-term and the long-term include several clerical and administrative support occupations, production occupations, and sales occupations.

Thirty Occupations with Declining Employment, 2005-2007				
Occupational Title	Estimated Employment			
	2005	2007	Change	Percent Change
Secretaries, Except Legal, Medical, & Executive	44,960	44,440	(520)	-1.16%
Stock Clerks & Order Fillers	32,380	31,860	(520)	-1.61%
File Clerks	4,660	4,320	(340)	-7.30%
Cutting, Punching, & Press Machine Setters, Operators, & Tenders, Metal & Plastic	11,680	11,390	(290)	-2.48%
Door-To-Door Sales Workers, News & Street Vendors, & Related Workers	8,100	7,820	(280)	-3.46%
Mail Clerks & Mail Machine Operators, Except Postal Service	3,770	3,510	(260)	-6.90%
Order Clerks	10,250	10,000	(250)	-2.44%
Paper Goods Machine Setters, Operators, & Tenders	8,110	7,930	(180)	-2.22%
Telemarketers	7,020	6,850	(170)	-2.42%
First-Line Supervisors/Managers of Retail Sales Workers	29,300	29,140	(160)	-0.55%
Computer Operators	2,500	2,340	(160)	-6.40%
Cashiers	64,920	64,780	(140)	-0.22%
Production Workers, All Other	9,330	9,210	(120)	-1.29%
Machine Feeders & Offbearers	4,200	4,080	(120)	-2.86%
Word Processors & Typists	3,010	2,900	(110)	-3.65%
Parts Salespersons	4,540	4,450	(90)	-1.98%
Loan Interviewers & Clerks	4,420	4,330	(90)	-2.04%
Switchboard Operators, Including Answering Service	4,200	4,110	(90)	-2.14%
Couriers & Messengers	3,150	3,060	(90)	-2.86%
Telecommunications Equipment Installers & Repairers, Except Line Installers	3,060	2,970	(90)	-2.94%
Office Machine Operators, Except Computer	1,840	1,760	(80)	-4.35%
Photographic Processing Machine Operators	1,280	1,200	(80)	-6.25%
Credit Authorizers, Checkers, & Clerks	1,020	940	(80)	-7.84%
Meter Readers, Utilities	850	770	(80)	-9.41%
Correctional Officers & Jailers	6,710	6,640	(70)	-1.04%
Computer Programmers	6,380	6,310	(70)	-1.10%
Textile Knitting & Weaving Machine Setters, Operators, & Tenders	520	450	(70)	-13.46%
Information & Record Clerks, All Other	5,320	5,260	(60)	-1.13%
Legislators	5,210	5,150	(60)	-1.15%
Woodworking Machine Setters, Operators, & Tenders, Except Sawing	3,870	3,810	(60)	-1.55%

Thirty Occupations with Declining Employment, 2004-2014				
Occupational Title	Estimated Employment			
	2004	2014	Change	Percent Change
Stock Clerks and Order Fillers	32,300	29,600	(2,700)	-8.4%
Secretaries, Except Legal, Medical, and Executive	44,620	42,510	(2,110)	-4.7%
File Clerks	4,600	2,870	(1,730)	-37.6%
Cutting, Punching, and Press Machine Setters, Operators, and Tenders, Metal and Plastic	11,520	9,840	(1,680)	-14.6%
Mail Clerks and Mail Machine Operators, Except Postal Service	3,720	2,370	(1,350)	-36.3%
Door-To-Door Sales Workers, News and Street Vendors, and Related Workers	8,480	7,170	(1,310)	-15.4%
Order Clerks	10,480	9,540	(940)	-9.0%
Telemarketers	6,850	6,020	(830)	-12.1%
Computer Operators	2,490	1,660	(830)	-33.3%
Cashiers	65,440	64,810	(630)	-1.0%
Machine Feeders and Offbearers	4,220	3,610	(610)	-14.5%
Word Processors and Typists	3,000	2,450	(550)	-18.3%
Electrical and Electronic Equipment Assemblers	6,180	5,750	(430)	-7.0%
Photographic Processing Machine Operators	1,270	840	(430)	-33.9%
Credit Authorizers, Checkers, and Clerks	1,000	590	(410)	-41.0%
Office Machine Operators, Except Computer	1,810	1,400	(410)	-22.7%
Meter Readers, Utilities	850	450	(400)	-47.1%
Woodworking Machine Setters, Operators, and Tenders, Except Sawing	3,820	3,420	(400)	-10.5%
Switchboard Operators, Including Answering Service	4,140	3,750	(390)	-9.4%
Parts Salespersons	4,420	4,060	(360)	-8.1%
Telecommunications Equipment Installers and Repairers, Except Line Installers	3,230	2,870	(360)	-11.1%
Legislators	5,300	4,980	(320)	-6.0%
Grinding, Lapping, Polishing, and Buffing Machine Tool Setters, Operators, and Tenders, Metal and Plastic	5,690	5,370	(320)	-5.6%
Couriers and Messengers	3,200	2,890	(310)	-9.7%
Coil Winders, Tapers, and Finishers	1,170	870	(300)	-25.6%
Packaging and Filling Machine Operators and Tenders	15,910	15,630	(280)	-1.8%
Extruding and Drawing Machine Setters, Operators, and Tenders, Metal and Plastic	2,460	2,190	(270)	-11.0%
Sawing Machine Setters, Operators, and Tenders, Wood	2,410	2,140	(270)	-11.2%
Weighers, Measurers, Checkers, and Samplers, Recordkeeping	2,470	2,210	(260)	-10.5%
Lathe and Turning Machine Tool Setters, Operators, and Tenders, Metal and Plastic	3,090	2,840	(250)	-8.1%

IV. C. In-Demand Industries and Occupations

Health care as an industry, and health care practitioners and technical occupations, as well as health care support occupations have both a strong immediate and long-term demand for workers. In 2007 alone, it is estimated that the industry will add 10,770 positions. During 2004-2014 the industry will add 76,780 jobs. Among health care practitioners and technical occupations, 5,270 workers (from replacement and growth) will be needed in 2007. Over the longer term, this need is projected to increase to an average of 6,430 workers per year. Among health care support workers the need for 2007 is 2,790 workers, and over the long-term it is 3,550 per year.

Construction as an industry, as well as construction and extraction occupations, also have substantial needs in the short- and long-term. In 2007 the industry is expected to add 5,470 jobs, and over the 2004-2014 period 23,570 jobs. Construction and extraction occupations will need 5,180 people (replacements and growth) in 2007, and about 5,030 people on average between 2004 and 2014.

Computer technology occupations are projected to be in demand over the next several years. These occupations are found in many industries, including financial activities, information, and professional and business services. About 3,000 job openings are expected in 2007. Over the longer-term the need is expected to increase to an average of 3,410 openings per year.

IV. D. Employment Critical to State's Economy

Wisconsin's economy is in transition from a traditional manufacturing economy with a large number of production occupations to a much more diverse economy relying on more technical occupations. This is occurring in manufacturing, health care, professional and business services, etc. Health care technicians and technologists, computer technology professionals, industrial technology workers, truck drivers, customer service representatives, and first/line supervisors in administrative services, production, retail trade and health care are among the most critical positions in Wisconsin's economy.

IV. E. Skill Needs

The top skill needs for jobs in 2007, and for jobs out to 2014, are (1) reading comprehension; (2) active listening; (3) speaking; (4) writing; and (5) critical thinking.

The entire lists of skill needs for current and projected jobs are below. These skills are also important in Wisconsin's critical occupations, although the relative significance of any particular skill varies by occupation.

2007 Skills Needed	
Skill	2007 Demand
Reading Comprehension	39,670
Active Listening	38,510
Speaking	34,020
Writing	29,530
Critical Thinking	27,470
Active Learning	26,150
Learning Strategies	24,790
Instructing	24,380
Coordination	22,680
Monitoring	22,640
Social Perceptiveness	21,790
Time Mgmt	18,410
Judgment and Decision Making	16,600
Mathematics	15,610
Service Orientation	14,990
Complex Problem Identification	14,310
Persuasion	11,900
Equipment Selection	8,750
Troubleshooting	7,420
Mgmt of Personnel Resources	6,890
Installation	6,430
Negotiation	4,630
Equipment Maintenance	4,610
Quality Control	4,240
Operations Analysis	4,220
Mgmt of Financial Resources	4,160
Systems Evaluation	3,930
Science	3,460
Repairing	3,400
Systems Analysis	3,380
Operation Monitoring	3,190
Mgmt of Material Resources	3,100
Operation and Control	2,550
Technology Design	2,260
Programming	730

2004-2014 Skills Needed (Average Annual Demand)	
Skill	Ave Ann Demand
Reading Comprehension	42,210
Active Listening	40,460
Speaking	35,900
Writing	31,400
Critical Thinking	29,260
Active Learning	27,370
Instructing	26,150
Learning Strategies	26,040
Monitoring	24,400
Coordination	24,380
Social Perceptiveness	23,430
Time Mgmt	20,210
Judgment and Decision Making	17,940
Mathematics	16,530
Service Orientation	16,400
Complex Problem Identification	15,390
Persuasion	13,190
Equipment Selection	9,210
Troubleshooting	7,550
Mgmt of Personnel Resources	7,260
Installation	6,360
Negotiation	4,900
Equipment Maintenance	4,750
Mgmt of Financial Resources	4,550
Operations Analysis	4,540
Quality control	4,380
Systems Evaluation	4,290
Systems Analysis	3,650
Science	3,560
Repairing	3,420
Mgmt of Material Resources	3,330
Operation Monitoring	3,180
Operation and Control	2,590
Technology Design	2,410
Programming	810

IV. F. Demographics of Labor Pool

Wisconsin's present and projected workforce is characterized by a more than normally large baby boom cohort. Wisconsin, being a predominantly white, non-Hispanic population, had a very large baby boom and subsequently has a very large cohort of 41 to 59 year old persons. The state also has not been a magnet state for new arrivals of immigrant populations and thus has not experienced large numbers of young replacement workers. Additionally, the large and particularly vibrant metropolitan areas like Minneapolis/St. Paul and Chicago have drawn a particularly large

population of recent Wisconsin college graduates. This has given Wisconsin early glimpses of worker shortages that are very likely to be exaggerated in the relatively near future.

IV. G. Labor Pool Migration

In-migration for Wisconsin has always included a fairly large contingent of migrant workers who have historically labored in Wisconsin's agricultural and food packaging industries. Many of the migrant workers have been attracted to other Wisconsin industries in recent years leaving voids in the agricultural and food packaging industries.

In recent years, Wisconsin has experienced considerable in-migration of residents into Wisconsin counties directly adjacent to the Twin Cities and Chicago markets. However, these new residents have jobs in the Twin Cities and Chicago markets. Rather than alleviate worker shortages, these new arrivals actually increase the need for service workers in the communities in which they now reside. They also create housing shortages and escalating housing costs for workers in the communities they are moving into.

Out-migration is occurring among Wisconsin's young, but particularly its young highly educated populations. Many of Wisconsin's young, recently highly educated populations are migrating to large dynamic metropolitan areas in the Midwest and other places in the country. These young people are very often attracted by the new industrial compositions of those communities.

IV. H. Skills Gaps of Labor Pool

From now until at least 2014, Wisconsin is most likely to experience the largest skill gaps in (1) reading comprehension; (2) active listening; (3) speaking; (4) writing; and (5) critical thinking. Significant skill gaps will also likely exist in 13 other skills (as illustrated in the following table).

Skills with the Largest Skills Gaps		
	Skills Gap Index	
Skill	2005-2007	2004-2014
Reading Comprehension	100	100
Active Listening	97	97
Speaking	94	94
Writing	91	91
Critical Thinking	89	89
Active Learning	83	86
Instructing	80	83
Learning Strategies	86	80
Monitoring	74	77
Coordination	77	74
Social Perceptiveness	71	71
Time Mgmt	69	69
Judgment and Decision Making	66	66
Service Orientation	57	63
Complex Problem Identification	63	60
Mathematics	60	57
Persuasion	54	54
Equipment Selection	51	51

IV. I. Workforce Development Issues

The most important workforce development issue identified by Wisconsin is engaging more people in the workforce. This includes minority workers, workers with disabilities, older workers, females, and others. Often this means addressing barriers to employment such as transportation, childcare, education and training.

The connection of workforce development to economic development has also been identified as a major issue in Wisconsin's economic success. The increased demand for higher skilled workers will require additional education and training. The need is for economic development that recognizes the hidden workforce (older workers, immigrants, persons with disabilities, etc.) and partners and collaborates with the workforce development community to make sure the economic development activities fully utilize the potential labor force.

IV. J. Priorities for Economic Health and Growth

Wisconsin has prioritized a number of industries as one strategy to address its future economic health. Governor Doyle's economic development plan, *Grow Wisconsin*, recognizes the need to develop training around several key industries in the state. That economic development plan has been integrated into the state's workforce development plans including the use of WIA funds. Targeted industries include: health care; construction and apprenticed craft occupations; manufacturing, with special emphasis on high end, high-productivity, high-wage firms; and biotech research and development firms. There is also emphasis on assisting the Milwaukee area to be a world-class urban center, as it has been throughout its history.

V. Overarching State Strategies

V. A. Leveraging Resources

Wisconsin has implemented a number of ways to use WIA Title I funds to leverage other federal, state, local, and private resources and will be developing additional strategies in the near future. All grants using WIA discretionary funds have some requirement of leveraged local resources. Recent examples include the CWI GROW grants, CWI Innovations grants, the Manufacturing WIA Incentive grants for 503 funds, a new Request for Proposal (RFP) for MSSC implementation that requires local leveraged public resources and private business resources if incumbent worker training is proposed.

WIA funds were identified as leveraged resources in our recently funded grant from the Joyce Foundation which is our first grant award directly from the Joyce Foundation to DWD. The soon to be released Emerging Industry Skills Partnership RFP that will target advanced manufacturing, biotech, and bio-fuels will also require leveraged local resources to be identified.

V. B. Strategies to Address National Strategic Direction

Our overall strategy can be summed up in three words – Regions-Sectors-System. The most clearly aligned strategy to address the national direction is our regional GROW grant program developed by the state CWI. The guidelines were first issued in June of 2005. Since then we have invested almost \$1 million of WIA funds in two rounds of grants to our seven GROW regions. This effort is to incentivize and support regional alignment of workforce development, economic development, education, business and labor to develop regional identities, implement strategies and enhance their global competitiveness and improve their regional economies. In addition to the GROW grants, we have launched the Regional Metrics Benchmarks that provides a set of 36 metrics to measure overall regional economic health.

To build on the regional alignment efforts, we are also pursuing sector strategies in key industry sectors that were highlighted in an earlier section. They are advanced manufacturing, biotechnology, bio-fuels, healthcare and construction. Sectors have statewide involvement as well as at the regional level as part of the GROW regional strategies.

While focusing on regions and sectors, we are also working on improvements to our system of service delivery by exploring alternatives such as technology for a “virtual job center,” distance learning, and also delivering training in faster and more efficient ways. Our RISE effort funded by the Joyce Foundation will add the career pathways component to our efforts and ensure that low skilled adults are able to advance in their careers.

In the fall of 2007 we expect to launch GROW III grants that will have added requirements for sector-based career pathway components. Attachment G identifies the state’s regional areas.

V. C. Strategies for High-Growth, High-Demand Occupations

Wisconsin is pursuing a number of strategies to identify and target occupations within the state that are high-growth, high-demand and vital to the state’s economy. The table below lists the 30 occupations with (1) 2005 wages/salaries above the state median; (2) 2004-2014 percentage change greater than the state average; and (3) 2004-2014 total openings greater than the state average. Among the 30 occupations, seven are concentrated in the construction industry, six are concentrated in health care, and five are computer-related and found in several industries.

High-Growth, High-Demand Occupations with Wages/Salaries above the State Median			
Occupational Title	2004-2014 % Change	2004-2014 Numeric Change	2004-2014 Total Openings
Registered Nurses	33.1%	16,010	26,140
Truck Drivers, Heavy and Tractor-Trailer	13.1%	6,980	15,720
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific	12.9%	4,340	13,200
Carpenters	18.0%	6,040	11,500
Elementary School Teachers, Except Special Education	12.8%	4,030	10,990
General and Operations Managers	14.3%	4,050	9,380
Accountants and Auditors	18.3%	4,140	8,420
Maintenance and Repair Workers, General	11.5%	3,100	8,260
Electricians	15.1%	2,070	4,780
Computer Software Engineers, Applications	45.9%	3,650	4,430
Plumbers, Pipefitters, and Steamfitters	19.9%	1,960	4,230
Computer Systems Analysts	25.1%	2,830	4,100
Licensed Practical and Licensed Vocational Nurses	14.6%	1,610	4,010
First-Line Supervisors/Managers of Construction Trades and Extraction Workers	15.9%	1,780	3,690
Operating Engineers and Other Construction Equipment Operators	15.3%	1,160	3,110
Sales Representatives, Wholesale and Manufacturing, Technical and Scientific Products	14.2%	1,080	3,080
Insurance Sales Agents	12.1%	990	2,940
Computer Support Specialists	18.6%	1,640	2,730

High-Growth, High-Demand Occupations with Wages/Salaries above the State Median			
Occupational Title	2004-2014 % Change	2004-2014 Numeric Change	2004-2014 Total Openings
Network Systems and Data Communications Analysts	47.9%	2,020	2,520
Painters, Construction and Maintenance	17.4%	1,330	2,500
Network and Computer Systems Administrators	35.7%	1,890	2,470
Heating, Air Conditioning, and Refrigeration Mechanics and Installers	26.7%	1,620	2,420
Child, Family, and School Social Workers	19.8%	1,250	2,320
Bus and Truck Mechanics and Diesel Engine Specialists	14.9%	840	2,290
Cost Estimators	20.2%	1,020	2,150
Medical Transcriptionists	28.8%	1,270	2,090
Radiologic Technologists and Technicians	31.7%	1,310	2,080
Medical and Health Services Managers	24.4%	1,130	2,040
Dental Hygienists	37.8%	1,660	2,040
Market Research Analysts	18.1%	840	2,040

The state's strategies will take into account these occupations as well as the key industry sectors that were identified earlier. Manufacturing is one that while not prominent on the chart above, continues to make up a large percentage of the state's labor force. An aging population and a need for higher level skills will drive investments in this sector in addition to targeting growing sectors and markets. Strategies will include targeted grant programs, some of which are listed in the later section on WIA Reserve activities. Some will also involve our regional partnership and career pathways efforts previously described. We will continue to pursue new resource opportunities such as the US DOL Community-Based Job Training funds such as the three grants recently received in biotechnology, health care, and advanced manufacturing.

V. D. Sustained Strategic Partnerships

Strategies for developing and sustaining partnerships range from big picture oversight to specific tasks involved in individual programs. The CWI continues to be the state workforce council where efforts such as the GROW Regional grants, targeted sector efforts, career pathways approaches, and strategies to improve the One-Stop service delivery system will be brought forward as both funded initiatives and policy recommendations.

Committees and task forces with a specific focus will also be developed as needed to address certain challenges. An example was an Ad Hoc Committee on Milwaukee that was convened during 2005-06 to bring forward a set of recommendations that are being implemented. The standing committees of the CWI will continue to serve as forum to identify additional directions to pursue and to provide feedback on current efforts underway.

A development over the past two years that will continue involves a joint committee to review various grants from different departments. Joint review that involves DWD, Commerce, and the Wisconsin Technical College occurs regularly now for the CWI/DWD GROW grants, WTCS Workforce Advancement Training grants, and the MSSC grants.

The most recent strategic partnership is between DWD and WTCS for the Joyce Foundation RISE project. We were joint applicants for the grant and will manage it jointly. A core steering committee will also include a local workforce board, a local technical college system, the University of Wisconsin Center on Wisconsin Strategy, and also involve our state DPI.

V. E. Strategies for Training in High-Growth, High-Demand Occupations

Training strategies using any discretionary funds will be targeted at key sectors and occupations with high growth and high demand. Demand might be focused on identified skill shortages such as welding which has become a crisis in the Wisconsin and in the midwest as our manufacturing sectors rebound. We are also targeting higher wage jobs through the 35% High Wage Job Training Requirement described under Section IX.C.3.a and designing out RISE career pathways project to address both growth and higher wage opportunities for low skilled adults.

Wisconsin was one of the states that qualified for incentive grants under WIA Section 503. The Department, in collaboration with the WTCS is using a portion of the incentive grant funding (\$640,000) to support four local projects that develop a continuum of services that will lead to a high skilled workforce. The envisioned continuum of services are based on the recent US DOL developed "Framework of Competencies by the Advanced Manufacturing Industry."

V. F. Strategies of Small Businesses

Several new efforts are underway in Wisconsin to support small business development. State legislation was passed in the past year to support the Wisconsin Entrepreneurial Network which provides statewide assistance from the Small Business Development Centers. A Business Plan Competition has been launched by the Governor and a few regions of the state have created their own as well. Wisconsin also embraced Entrepreneurs Week this year and convened several webcasts with one focused specifically at young entrepreneurs. Wisconsin's One-Stop Job Center system has historically worked more with small businesses that may not have their own human resource departments and continue to do that, offering workshops, etc., on business human resources issues.

V. G. Reserve Funds (set-aside funds) for Statewide Activities of Governor's Vision and National Strategic Direction

Reserve funds are used to support regional and sector-based strategies through the CWI efforts listed below, in targeted ways to assist our major urban area, and with small investments in other promising programs:

CWI grant projects – earmarks \$500,000 per year for special projects. The following includes efforts that will continue into Program Year 2007:

- Seven GROW grants are in place for a total of \$500,000 and will continue into PY2007. These regional grants have been described earlier and are the cornerstone of Wisconsin's efforts to support regional efforts and complement the national direction in workforce development.
- Preliminary plans are to provide continued funding for these GROW regions in the fall of 2007 for GROW III in conjunction with the Joyce Foundation RISE career pathways project.
- MSSC – \$250,000 will be used to build connections between the workforce system and the MSSC efforts underway in the technical college system. These funds will help achieve Governor Doyle's vision of reaching a goal of 40% of the manufacturing production workforce being certified by 2016.

Urban Projects in Milwaukee – a variety of projects have been funded to address significant workforce challenges in Milwaukee. The following are projects that will continue beyond July 1, 2007 and into the next program year:

- Milwaukee Job Development, Inc. – The new agency was established to serve low income job seekers after the demise of a long standing organization that served primarily the African-American community in Milwaukee. A \$500,000 grant was awarded for the calendar year of 2007 to provide job placement services. The agency opened its doors on January 3, 2006, and the grant will run through this calendar year.
- Ex-Offenders Project in Construction and Manufacturing – DWD and DOC have partnered to send ex-offenders for training at the Wisconsin Regional Training Partnership. This second year of funding for 2007 is for \$50,000 and is split equally between WIA funds and state corrections funding.
- Wisconsin Community Action Program Association (WISCAP) Skills Enhancement – The Milwaukee Social Development Commission receives the largest sub-grant from this \$500,000 statewide grant to WISCAP mentioned below.
- Milwaukee Public Schools Youth Apprenticeship Grant – This \$45,000 grant helps support the work-based learning program. It is a relatively small grant for the size of the city but is a student/staff/employer intensive program. This statewide program is funded by General Purpose Revenue (GPR) and has had funding cut in half in recent years but Governor Doyle is proposing to increase statewide funding from \$1.1 million to \$2.2 million over the next biennium.
- Southeast WI Regional efforts – The Governor's CWI grant recently awarded a second GROW grant in the amount of \$110,000 to support the development of a Regional Workforce Alliance and the region was also awarded a WIRED second generation grant from US DOL. These efforts are coordinated with the Milwaukee seven.

Other Targeted Efforts

- Wisconsin Community Action Skills Enhancement Program - This \$500,000 funds 11 community action projects to raise the skills and income of 480 working adults. This builds on the first grant of \$750,000 that began in November of 2005. First results were very good, with wages being raised \$2-4 per hour for participants and also gaining health insurance benefits.
- Southwest Rock County Opportunities Industrialization Center Workforce Academy project – This \$150,000 grant goes through the Southwest Workforce Board to support this project in Beloit. This is a second round grant to continue support for the community-based organization that serves minority males, ages 18-30 to develop a career plan and obtain employment.

V. H. Strategies for Collaboration to Serve Youth

Wisconsin's major new strategy was mentioned earlier and that is Governor Doyle's proposal for a new state department that would be called the Department of Children and Families and would include TANF, Child Care, Child Support and other related programs the serve low income, low skilled families in Wisconsin. This effort will allow increased coordination or wrap-around services to the state's neediest children and families. This effort is in part an outgrowth of an National Governors Association sponsored Service Integration project that has been underway for the past few years in Wisconsin. The WIA Youth program will coordinate with this new department to ensure a connection to employment and training initiatives.

We will also be continuing a small project in partnership with our state DPI and the private Kern Foundation to support the expansion of Project Lead the Way, a pre-engineering program for high schools. The objective for the coming year is to better connect that to the workforce system and the WIA Youth Councils to ensure access to WIA eligible youth.

Notwithstanding these organizational shifts, Wisconsin continues a number of initiatives to promote collaboration between the workforce development system, education, corrections, human services, juvenile justice, technical colleges, and other youth serving agencies and organizations. These entities have come together to better serve youth that are most in need and have significant challenges to employment, and to connect them to education and training opportunities that lead to successful employment.

These initiatives include:

Reach for the Arts

“Reach for the Arts” is a program geared toward training WIA youth from Milwaukee’s High School for the Arts for employment in the arts industry. The partners involved in this initiative include: Milwaukee County Private Industry Council (PIC), Wisconsin Conservatory of Music, Florentine Opera Company, Marcus Center for the Performing Arts, and Milwaukee Symphony Orchestra. DWD staff has provided technical assistance and training for the WIA staff involved as well as the participants enrolled in the program.

Wisconsin Statewide Transition Initiative (WSTI) for Youth with Disabilities

The mission of WSTI is to improve the results for students with disabilities by providing staff development, support services, and disseminate information to directors of special education, special education teachers, parents, youth and community agency providers on transition requirements and best practices. This collaborative partnership is comprised of state and federal agencies as well as a variety of non-profit organizations working together to develop a comprehensive approach to provide transition services to high school youth with disabilities as they transition to post secondary education and/or employment. A positive result of this initiative is that more schools are referring youth with disabilities to the WIA youth program in their WDA. While no WIA Title I funding is dedicated to this initiative, the DWD WIA youth policy analyst participates in this effort.

Youth Apprenticeship

Youth Apprenticeship is a statewide system of business and education partnerships that prepare Wisconsin high school students to compete in the global economy through the use of on-the-job training and related classroom instruction. There are 22 one and two-year youth apprenticeship certificate programs ranging from Auto Technician to Health Services to Welding. Each industry provides training in high demand/high wage career opportunities.

Former Foster Care Youth Grant (FFCYG)

DWD received a million dollar grant from DOL to develop a model to serve Former Foster Care individuals. DWD has partnered with the DHFS, and DOC, and the Milwaukee County PIC to provide education and training services to these individuals. The goal is to coordinate services provided through this grant with the PIC’s WIA Youth Program and the Independent Living program. The FFCYG goals and program design are consistent with the WIA Youth Performance Measures:

- Both programs are focused on certificate/credential attainment, entered employment, earnings gains, and employment retention;
- For those individuals who need a high school diploma or a general education diploma before moving into post secondary education, both the FFCYG and the WIA youth programs support the goal of attaining a high school diploma or its equivalent; and
- Both programs use a case management framework that emphasizes assessment and career development to assist participants in reaching their program goals.

A collaborative relationship between the Milwaukee County PIC's WIA youth and adult programs and FFCYG has been developed to ensure all participants who may benefit will be participants in both programs. Participants may also use WIA Individual Training Accounts or One-Stop core services. The project manager is a DWD employee and is located at the Milwaukee County PIC office.

The grant period for this project will end June 30, 2007. FFCYG participants will be referred to other available education and training programs and supportive services programs as needed.

V. I. Impediments to Achieving Goals and Strategies

Through its biennial budget process Wisconsin reviews state statutes to determine changes needed to allow for successful achievement of workforce development goals and strategies. DWD policy staff review WIA program policy on a continuous basis and respond to local concerns expressed by WIA monitoring staff to determine where changes or clarifications are needed. Discussions with local partners through various groups including the WAJTE (WDB directors), ASSET Users group, TAT group, etc., also help to identify areas where improvement is needed.

The CWI is charged with recommending where changes are needed to better meet Wisconsin's workforce development goals. Through its three standing committees the CWI reviews and provides input on issues related to implementing the Governor's *Grow Wisconsin* initiative overarching goal of providing "Qualified Workers for Quality Jobs."

V. J. Waivers and Workflex

Waiver Requests:

Subsequent Eligibility: DWD, the administrative entity for the WIA in the State of Wisconsin, respectfully submits this request to extend its existing waiver of provisions found in the WIA Section 122 (c)(5) and Code of Federal Regulations (CFR) 663.530, to be permitted to continue the period of initial eligibility for training providers included on Wisconsin's Eligible Training Provider List until the end of the two-year state plan that expires on June 30, 2009, or until WIA reauthorization, whichever occurs later.

The DOL first granted to the Governor of the State of Wisconsin a waiver of the time limit on the period of initial eligibility for training providers for the 18-month period ending January 1, 2004; and, extended the waiver on these provisions through June 30, 2004; and, extended the waiver again through June 30, 2005; and, extended the waiver again through June 30, 2007.

The subsequent eligibility policy will likely be eliminated in WIA reauthorization. If this does not occur, this proposal to postpone subsequent eligibility will permit the state to consider cost-effective methods of collecting required performance data for non-WIA participants in training.

Workflex: Wisconsin is not a Workflex State.

VI. State Policies and Requirements

DWD provides ongoing operational policy updates and posts draft policies for review and comment that can be accessed at <http://www.dwd.state.wi.us/dwdwia/policy.htm>

VI. A. Common Data Collection and Reporting Processes

The ASSET is used to track job seeker services for WIA Title 1-B, Title III, Trade Adjustment Assistance (TAA), Unemployment Insurance (UI) Reemployment, and DOC Offender Release program.

ASSET and its associated data warehouses provide participant and performance information to help manage the programs within a Job Center. To track services provided to business Job Centers use JobNet, and its associated data warehouses enable DWD to evaluate service to employers, provide reports to manage the Job Centers and demonstrate accountability for business services. Use of JobNet Business (JNB) is required for all Job Centers.

VI. B. Administrative Resources

DWD began an initiative in early 2005 to refocus Wisconsin's Job Center system to support *Grow Wisconsin* that will require a greater emphasis on training in order to meet the demand for high skill workers. Beginning in PY2006, DWD required that each WDB reserve 35% of each year's allocation of WIA Title 1-B funds for skill training and training supports to prepare people for high-wage/high-quality jobs.

A basic premise of the Job Center idea has been to gain operational efficiency and reduce duplication by housing services in a central location. The state recognizes the need to demonstrate a strong commitment to the Job Center system. In that spirit, DWD Secretary will explore requiring the following DWD direct service staff to relocate to Job Centers whenever possible: Equal Rights, Apprenticeship, UI (other than call centers), Labor Market Analysts, Vocational Rehabilitation, and Wisconsin Works (W-2).

DWD is committed to the development and continuous improvement of reporting/information brokering systems not only to keep pace with federal requirements but, equally important, to provide customers, direct services staff and managers with state-of-the art tools.

VI. C. Universal Access

Section 188 of WIA (20 CFR Part 652 et. al.) prohibits discrimination on the basis of disability as well as race, color, religion, sex, national origin, age, political affiliation or belief, and, for beneficiaries only, of citizenship on the basis of an individual's status as a citizen or national of the United States, or as an individual lawfully authorized to work in the United States, or of his or her participation in any WIA Title I-financially assisted program or activity.

In accordance with the Section 188 regulations, the Governor monitors all WIA Title I-financially assisted programs. This responsibility includes ensuring compliance with the nondiscrimination and equal opportunity provisions. Section 188 regulations specify that each Governor must establish and adhere to a "Methods of Administration" (MOA) for state programs under WIA Title I. The MOA must give a reasonable guarantee that all recipients comply with the nondiscrimination and equal opportunity provisions of WIA and the implementing regulations. Wisconsin has an approved MOA with an expiration date of June 24, 2006. DWD staff conducts regular training and monitoring on the application of the MOA and Section 188 to Job Center operations to ensure universal access for all customers.

VI. D. State Policies that Support a Demand Driven Approach (not mentioned elsewhere in Plan).

This is described elsewhere in the Plan:

- See IX. B. for a description of plans to increase awareness of high quality labor market information;
- See IX. D. on Rapid Response activities that are demand-driven;
- See IX. E.3. for the demand-driven youth activities; and,
- See IX. F. on Business Services.

VI. E. Apprenticeship and Job Corps

Applications for the Job Corps are available at all Wisconsin Job Centers. Through local agreements, Job Corps representatives hold office hours in several of the Job Centers. Although apprenticeship field representatives are not co-located in Job Centers, apprenticeship information is provided in the resource rooms. In addition, many of the local apprenticeship committees use the Job Center to post apprenticeship recruitment notices.

VII. One-Stop System

VII. A. Quality and Competencies

As part of DWD's effort to *Grow Wisconsin* through a "strong and focused Job Center system," new requirements were implemented in PY 2006 for the classification of Job Centers. Requirements are described in the comprehensive and access points of service centers requirements (See IX.A.3).

DWD has implemented the *Job Center Service Standards* for job seekers and employers. Working with DWD, the WDBs are implementing a staff competency and credentialing system for workforce professionals that was launched by the CWI in PY 2005. The system uses the National Association of Workforce Development Professionals' competency program.

VII. B. Maximum Integration for Business and Individual Customers

Governor Doyle established a strong link between workforce development and the economic growth of Wisconsin's economy in his *Grow Wisconsin* initiative. DWD is responding to his leadership by refocusing our direction to Job Centers.

DWD provided training beginning in late PY2003 and throughout PY2004 in support of maximum integration of services to individuals and business. The effort began with the two Business Relations Group (BRG) symposia held in June of 2004. Regional and national DOL staff participated in the symposia. Attendees received an introduction to the BRG and to demand-driven service delivery. Also included in the event were sessions on Working with Economic Development and Using Labor Market Information in service delivery.

Job Center Roundtables are held each spring and fall with New Orientations held each July. Breakout sessions were held on: what business wants from Job Centers; how to coordinate services with economic development; and, current labor market conditions.

Since 2005, DWD has sponsored Job Development Symposia. These two-day sessions emphasized the importance of working with business to determine their needs in order to find jobs for the individuals coming to the Job Center. Attendees included staff from Job Centers, Job Service, WDBs, Vocational Rehabilitation, DOC, W-2 agencies, and Refugee Employment and Training projects.

DWD has leveraged WIA Title 1B funds with funding from the Workforce Information Core Products and Services Grant, TANF and WIA Title III to deliver a series of training sessions to Job Center line staff. The training is designed to improve customer service skills. Training programs include: Resource Room 101 and 201; Using the WisCareers System; Basics of Labor Market Information (LMI); and, Serving Offenders.

VII. C. Job Center System - Infrastructure Costs

At the onset of the One-Stop system development in the 1990's, Wisconsin provided extensive assistance in identifying infrastructure costs and recommending appropriate cost allocation

methods. Wisconsin contracted for the development of a *Cost Allocation Resource Guide* that identified practices that are still in use today.

A key component of infrastructure is the Information Technology (IT) system used in the Job Centers, which includes Internet based systems as well as PCs in the Resource Rooms. The state provides ongoing support for these systems and works with local centers to plan for PC replacement as needed throughout the year.

In the past few years, as a result of a reduction in funding from all partners, many smaller Job Centers are struggling to remain viable. At the local level, as part of the process of developing the Memorandum of Understanding (MOU) for each Job Center, the One-Stop Operators will identify how infrastructure issues will be managed and describe how costs will be shared within the Centers. This is reviewed at the state level in the *WDA Plan* review process.

VII. D. Reserve funds for Statewide Activities

Statewide funds will continue to be used to develop and upgrade ASSET and maintain other Job Center data systems like the Case Managers Desk Reference, JobNet, JNB, and WORKnet. These statewide funds are usually used in conjunction with funds from TANF, Wagner Peyser 10%, and the Workforce Information Core Products and Services Grant.

DWD provides technical assistance to Job Center staff to improve services to individuals and business and to meet program requirements.

VII. E. Full Array of Services and Staff

To become demand driven and meet the goals of the Governor's *Grow Wisconsin* initiative, a high level *WDA Plan* was developed that identifies the workforce and economic needs of the area. Within the planning process each WDB will account for regional economic initiatives, business trends, worker skill/sector-based training needs and efforts planned to address them.

WDBs have implemented new business services that focus on employers that offer entry level jobs that pay self-sustaining wages. Core and specialized business services are available through Business Services Team.

Services to job seekers will focus on building career resiliency over a lifetime of work. Job Seeker services will include a new emphasis on understanding the labor market in which they are seeking employment, choosing employers that offer good wages and opportunities for advancement, how to rehabilitate credit and build financial assets.

VIII. Administration and Oversight of Local System

VIII. A. Local Area Designations

VIII. A. 1. WDAs and Timeframes

Wisconsin has operated with 11 state designated WDAs since 1998. Attachment F identifies the boundaries and Job Centers within each WDA.

VIII. A. 2. Process of Designation

The CWI was intimately involved in the reconfiguration of the WDAs in 1998. Working subcommittees of the CWI included customers from the field in the redesign and formation of the WDAs and WDBs. Leadership from many of the local elected officials

and input from other partners including education entities were garnered to determine the most effective boundaries for service delivery.

In 1995, statutory responsibility was given to the CWI to recommend employment and education boundaries aligned as closely as possible with the technical college district boundaries. The operational configuration of the 11 WDAs also interfaces with local labor market areas.

For implementation of WIA, the state intended to continue with the 11 WDAs unless local areas requested changes. Consensus from the local elected officials and area partners confirmed that the boundaries were working well to meet the needs of employers, the workforce and effected partners. The state requested a formal notification from the WDAs' Chief Local Elected Officials (CLEOs) in the May 1999 *Local Elected Officials Guide* whether they planned to stay with the current county boundaries, or planned to convene meetings with other local elected officials to discuss possible changes to the current configuration. The letters of intent from the CLEOs were received by June 30, 1999, confirming the retention of the 11 operating WDAs.

If a local area is interested in designation as a WDA, the unit(s) of local government, or, the area CLEO, must send a request to the Governor outlining the provisions under the Act under which they propose designation, the boundaries of the proposed area and a brief rationale for the request. Once received, DWD staff will review the request to determine if it meets requirements of the Act. The request will then be posted for review and comment and given to the CWI for consultation. Once the CWI consultation is complete and provided to the Governor, the Governor will make the designation decision and inform interested parties.

VIII. A. 3. Appeals Process

CLEOs may file an appeal with the Governor and/or the Chair of the CWI within 30 days of notification that the request for designation was not approved. The Appeal must provide the basis for challenging the failure by the Governor or the CWI to approve the designation request, and cite a failure by the Governor or his/her designee to properly consider the criteria enumerated clauses (i)-(v) of Section 116(a) (1)(B) of the WIA.

The Governor or the Chair of the CWI, could then refer the Appeal to an appropriate committee of the CWI for review and a determination whether the criteria were appropriately applied to the request for designation.

The Governor or the Chair of the CWI was required to issue a final decision of the designation request within 15 days. The final decision, if unsatisfactory to the appealing parties, could be further appealed to the Secretary of DOL as provided in Section 116(a)(5) of the WIA.

VIII. B. Criteria for Local Board Membership

In addition to the federal requirements of WDB membership and processes, Wisconsin had established the following additional criteria:

- To ensure demographic diversity on the local boards, membership must be comprised of at least 20% female members;

- If there are at least 3% minority population in an area, there must be at least one minority representative appointed to the local board; and,
- To ensure that business members are those with employment opportunities in the area, we strongly encourage that the industries making up more than 10% of the industries in an area should have members equal to at least one per every 10% (e.g., 33% manufacturing would mean at least three business representatives from manufacturing businesses; 25% service would require at least two service industry representatives. If a WDA chooses not to follow this guideline, they must provide an explanation of why they used a different industry mix (e.g., focusing on particular industries to deal with the needs of the area)).

VIII. C. Capacity Building of Local Boards

In the past two years the CWI has provided small grants for workforce boards to use the Baldrige Self-Assessment. While no funding has been allocated in the 2007 program year, efforts will be made to encourage this continued focus on quality and continuous improvement.

DWD has also initiated state-called bi-monthly meetings with the workforce board directors in addition to their regularly held monthly meetings. The new meeting will provide the opportunity to convey information and potential new directions from the Governor and DWD. As part of the regional GROW grant program, we will also be providing a variety of technical assistance activities over the coming years that include website development, online surveys, conference calls, and conferences to assist the boards in developing their regional partnerships.

VIII. D. Local Planning Process

WIA establishes local Workforce Investment Boards which are called WDBs in Wisconsin. The broad purpose of the WDB is to set policy for the workforce investment system within the local area. Wisconsin's vision for WDBs is to support *Grow Wisconsin*, which includes: increasing education, skills and wages; focusing on the future economy; making smart and strategic regional decisions; and, fostering entrepreneurship. WDBs also fund service providers and maintain effective oversight of the local workforce investment system. The WDB is to guide the development of a system-wide approach which achieves the purpose of the WIA including: increasing employment, and retention and earnings of participants; increasing occupational skill attainment; improving the quality of the workforce; reducing welfare dependency; and, enhancing the productivity and competitiveness of the state's and nation's economy.

VIII. D. 1 Oversight

Absent WIA reauthorization, the DOL is requiring states to submit a plan for the third and fourth years of the five-year planning cycle. Wisconsin will issue *Local Plan Guidelines* for the third and fourth years of the planning cycle to coincide with DOL's requirements for the state plan. All 11 Title I local plans will be reviewed by the CWI, and approved by DWD.

The specific functions of the WDB are to:

- Develop and submit a comprehensive two-year local WDA plan;
- Coordinate workforce investment activities with economic development strategies and develop other employer linkages;
- Promote the participation of private sector employers in the statewide workforce investment system and ensure the effective provision, through the system, of connecting, brokering, and coaching activities, through intermediaries such as the One-Stop operator in the local area or through other organizations, to assist such employers in meeting hiring needs;

- Select WIA Title I-B operators with the agreement of the CLEO and providers;
- Develop a budget subject to the approval of the CLEO to implement these functions and direct the disbursement of WIA Title I-B funds;
- Conduct oversight of WIA Title I-B youth, adult and dislocated worker programs and the One-Stop system.

DWD will send a letter to all 11 WDBs providing instructions for negotiating and reaching agreement between the WDBs with the CLEO and the state on the WIA local performance standards for PY 2007 and 2008 once we have received guidance from the US DOL regarding negotiating performance for those years at the state level.

VIII. D. 2. How Does the Local Plan Approval Process Ensure that Local Plans are Consistent with State Performance Goals and State Strategic Direction?

- The WDB is responsible to DWD for its local plan. The plan includes WDA goals and integrated strategies that advance *Grow Wisconsin*. The state plan guides the local plan. Local plans are reviewed by DWD to determine if they meet the requirements of local WIA plans as required by federal statute, regulation and DWD policies.
- The plans of other partner programs (WIA Title 2-Technical College, WIA Title 3 – Job Service and WIA Title 4 – Division of Vocational Rehabilitation (DVR), TANF and others) support and are aligned with the local plan.
- The local plan supports and aligns with local and regional economic development plans.

VIII. E. Regional Planning:

VIII. E. 1. Intra/Inter-State and Performance Measures

VIII. E. 2. Designations and Activities

VIII. E. 3. Roles

The following explanation addresses all of the above elements for regional planning: The local planning phase in the fall of 2007 will focus on regional planning to coalesce all of the workforce activities funded from a variety of sources into a cohesive vision of regional workforce development efforts. As previously discussed, the CWI *Grow Grants* were developed to provide incentives for regional alignment of workforce development, economic development, education, business, labor and other regional activities. Preceding that initial thrust, additional grants have been committed on a regional basis such as targeted efforts among specific employment sectors. The goals for this next planning cycle include formally bringing together the various partners for further refinement of regional economic development strategies and new approaches for regional service delivery. The tenets of GROW and WIRED initiatives will be used to guide this process.

DWD and WDBs continue to have inter and intra-state activities with regions corresponding to the rich cross-border employment and employee resources. For example, in Rapid Response, two plants closed in Minnesota with one-half of those employed from Wisconsin and the states jointly developed solutions including Minnesota offering their career advancement accounts. Within the state, Jewel closed all of their stores in southeast Wisconsin and the partners in that area's WIRED grant worked together for a regional response to this situation.

Goals and/or performance measures will be developed as this regional planning cycle unfolds. Currently, each Grow Grant has specific measurable accomplishments and objectives that will likely dovetail the state's regional measurements. In addition, the Regional Metrics Benchmarks noted earlier provide a set of 36 metrics to measure overall regional economic health, and the

CWI continues to work on a metrics model for the state. Attachment G shows the states' regional areas.

VIII. F. Allocation Formulae:

VIII. F. 1. Methods and Factors

Wisconsin does not use adult or youth alternate formulae.

VIII. F. 2. Equitability

Wisconsin uses the fund distribution formula found in WIA Chapter 4, Sec. 128. The formula for fund allocations to the local WDBs is based on several demographic factors. The main factors are population, census ratio, employment rates, unemployment rates and past performance. This formula is mostly population driven, although it also takes into account factors such as disadvantaged youth levels. Adjustments are made to increase funding to high unemployment areas and to reward WDBs that meet performance standards. Adult and Youth each have their own formula.

There is also a hold harmless clause which provides each WDA at least 90 percent of its prior year funding. In this case, the fund allocation to the WDA is adjusted upward so that 90% of its prior year funding is achieved.

VIII. F. 3. Dislocated Worker Formula

All funds for dislocated workers will be distributed throughout the state using the six-part formula in the WIA. Individual area allocation shares are adjusted using the hold-harmless method stated in the DOL Secretary's September, 1999 directive. This will limit dramatic shifts in funding levels. The following chart illustrates the formula:

Allocation Factor	Weight Assigned In Formula	Data Source(s) and Time Period
Unemployment Concentrations	25%	A substate area had to meet or exceed the state unemployment rate or have 10% or more of the unemployed workers in the state in order to qualify for this factor. Qualifying substate areas receive a prorated share based on the total number unemployed located in substate areas meeting the threshold.
Declining Industries	25%	The decline in employment by industry from a 1982-84 base period to the most recent year for which data is available was used to determine long-term trends and provide consistency. Substate areas receive a prorated percentage of the state total.
Farm Hardship	12.5%	Substate areas receive a prorated percentage of the total loss in the number of farms from a 1982-84 base period to the most recent year for which data is available.
Plant Closing/Mass Layoff	12.5%	Substate areas receive a prorated percentage of the total number of persons reported as being laid off from their employment by employers who file notification under state and federal plant closing/mass layoff laws.

Allocation Factor	Weight Assigned In Formula	Data Source(s) and Time Period
Long-Term Unemployment	18.75%	Substate areas receive a prorated percentage of the total number of persons who received unemployment compensation payments for at least 15 weeks in a benefit year.
Insured Unemployment	6.25%	Substate areas receive a prorated percentage of the total number of persons who received at least one unemployment compensation payment in a benefit year.

VIII. F. 4. State Board Involvement

In the planning process for the allocation formula input from local boards was sought through WAJTE and Local Elected Officials through the Wisconsin Counties Association. The CWI Ad Hoc WIA Committee reviewed the allocation formula when it was originally established in 2000. The policy has not changed since 2000.

VIII.G. Provider Selection Policies

VIII. G.1 Policies, Procedures, and Performance

The policies and procedures, applied by local areas, for determining eligibility to be on the Wisconsin's Statewide List of Eligible Training Programs and Providers (ETP List) are found in the Initial Eligibility policy. It requires all training providers to complete a standard application. Following the requirements of WIA Section 122, training providers covered under Title IV of the Higher Education Act and the National Apprenticeship Act only have to submit an application to be eligible for the ETP List.

The group of training providers not covered by either act must have applications approved by the WDB before it is submitted to the state for final 30 day review and inclusion on the ETP List. Following are the criteria for approval:

- The application is complete;
- The description of the program of training services is complete;
- The performance information addresses: 1) program completion rates for individuals participating in the program; 2) percent of individuals who obtain unsubsidized employment; and 3) wages at placement in employment;
- The performance information is for the most recent 12-month period;
- The application contains the required cost information;
- The training provider has not violated any conditions of WIA; and
- A training provider of Certified Nursing Assistant programs must be approved by the DHFS and be on its registry before it can be approved and placed on the ETP List.

Currently, Wisconsin is not required to use collected performance data to determine continued eligibility for training programs found on the ETP List. In 2002, DWD received a waiver to postpone implementation of the Subsequent Eligibility provision of WIA. One consideration for this waiver request was the impact WIA reauthorization would have on training provider performance data collection and reporting requirements.

Since the time the extension of the time limit for Initial Provider Eligibility was granted, DWD completed construction of an ETP database, and created a new web-based interface (<http://www.wisconsinjobcenter.org/ita>) that dramatically improved dissemination of ETP information to training seekers and case managers.

The website contains program specifics for all eligible training programs, links to current Wisconsin policies, and two "Scorecards" with detailed information on training programs and training providers. The Scorecard data is returned to the ETP database from the ASSET case management system. Case managers record program and training provider information specific to Individual Training Accounts (ITA) training voucher holders. Information is anonymously reported for participants who complete or drop out of training, and their occupational outcome. The use of this information in guiding future eligibility determination of training programs and providers is possible, but remains in question because of data constraints.

When the decision point is reached for the role these Scorecards may play, a workgroup will be formed to consider performance, and recommendations to DWD will be made. A similar convention was followed in 2002, a group known as the Subsequent Eligibility Workgroup.

VIII. G. 2. Solicitation

The process for soliciting comments and suggestions in the development of the Initial Eligibility policy followed the same route that all WIA development activities took. A WIA workgroup on training issues and a separate workgroup on dislocated workers met several times during the summer months of 1999 to offer suggestions. Comments also were sought via the department's WIA web-site. All suggestions were considered in developing the Initial Eligibility policy. When a draft was completed, it was sent along with the draft application to the employment and training community for comments. Included in the audience were unions, technical colleges, private for profit training institutions, and all WDBs.

In 2001, DWD formed a Subsequent Eligibility Workgroup. It consisted of representatives from WDBs, WTCS, unions, Wisconsin Educational Approval Board and private for profit training institutions. They met throughout 2002 and developed policy recommendations concerning *the WIA State List of Eligible Programs and Providers*. Included in their policy recommendations was Wisconsin's request for a waiver from subsequent eligibility.

DWD's standard procedure for issuing a new policy is to develop a draft and then send it to the employment and training community for 30 day review and comment. Comments from the review are incorporated into the final policy.

VIII. G. 3. Maintenance of State Training Provider List

Wisconsin's *WIA State List of Eligible Programs and Providers* (ETP List) is maintained by staff in the Bureau of Workforce Programs (BWP). Once an application is approved by one of Wisconsin's 11 WDBs, it is sent to BWP for final review. BWP staff is granted 30 days to review WDB-approved training provider applications, by policy. If a problem is identified, the application is returned to the WDB for further clarification, completion or correction. If problem exists, the training program and the corresponding details about the training provider is placed on Wisconsin's ETP List.

Enhancements to the ETP List and improvements in the dissemination of training program information have been ongoing since its debut in 1999. It has evolved from a HTML-based series of flat files with a dedicated search engine to a stand-alone data base application with a pre-filtered web-based interface. These improvements in sorting and filtering data, and presentation to the user were guided by customer feedback.

Future plans call for delivering the capacity whereby training providers may update their training program details via a web-based interface. Status quo has WDB representatives maintaining a working relationship with representatives of those training providers who were approved by that WDB. Changes to the ETP List for training providers or their programs are solicited by these WDB representatives and reported to BWP. BWP maintains a mail distribution list for notification to keep WDB representatives and other ITA-interested parties informed of changes to ITA-related aspects of the WIA.

VIII. G. 4. Appeal Process

A procedure was established in the state's initial year policy for training providers to appeal a denial of their eligibility to be on the ITA list. It also addresses appeal situations for a provider's termination and removal from the State list. The policy includes the following specific section on the appeal process:

"Training providers have a right to appeal a local or State decision denying them eligibility or terminating them on the local and State List of Eligible Training Providers. The primary reasons for denial and termination, as cited in the Workforce Investment Act (WIA) section 122 and Regulations 663.510, are a training provider: 1) has not met performance standards, 2) has provided inaccurate information, and 3) has "substantially" violated the Act. In all cases, consultation between the State and local Workforce Development Boards (WDB) must take place before action can be taken against the training provider.

When an eligible training provider is terminated from the list, the following procedures will be followed:

- The training provider will be notified in writing of the action to terminate, and the cause for the termination. Depending on the discussion between the local WDB(s) and the State, one of these entities will author the letter. It will be in a prescribed format agreed upon by both entities.
- The letter will say that in 60 calendar days from the date the letter was signed, the training provider will be removed from the State List of Eligible Training Providers.
- The letter will also inform them of the process they follow to appeal the action."

VIII. G. 5. Grants and Contracts Processes

Granting of funds in competitive and non-competitive processes is done in accordance with the State Procurement Manual that details procedures and the public notifications requirements for potential bidders to be made aware of the availability of grants and contracts. Most state procurement rules apply to the purchase of goods or services rather than grants to serve individuals. The majority of our grants are made through a public RFP process and on occasion targeted grants are made to address specific challenges that have been identified.

VIII. G. 6. Local Criteria for Youth Activities

Each WDB develops the criteria, in accordance with WIA law, for selecting youth service providers. DWD encourages them to develop their criteria on the following principles: demonstrated effectiveness, financial stability, fiscal accountability, cost effectiveness, qualifications, and expertise of staff, and demonstrate linkages with other youth service providers, schools, employers, and the Job Center system.

WDBs are required to keep DWD informed of current information on each of their youth service providers through their local plan and modification process. DWD provides this information on its WIA website (<http://www.dwd.wisconsin.gov/dwdwia/youth/default.htm>). The information collected includes WDB counties covered by a provider, their contact information, whether they serve in-school and out-of-school youth as well as younger and older youth.

DWD Local Program Liaisons (LPLs) monitor WDBs to ensure youth programs comply with state policy, WIA Law, Rules and Regulations. DWD has provided TAT to local boards on the RFP process and how to solicit and contract with quality youth service providers and determine their ability to provide the ten required program elements.

WDBs use several criteria to rate the success of youth service providers, which helps them identify effective and ineffective activities. WDBs also monitor each youth service provider, on a regular basis, to ensure they are providing the services listed in their contract.

VIII. H. One-Stop Policies

VIII. H. 1. Coordination of Partners and Wagner-Peyser Funds

The Wisconsin Job Center system involves all WIA mandated partners described in 20 CFR 662.200. WIA requirements and state policies have driven collaboration and coordination efforts. Roles and responsibilities are formalized through the development of the local MOU.

DWD administers Vocational Rehabilitation, TANF, WIA, and Wagner-Peyser programs, and maintains an inter-agency collaboration team to further enhance coordination between programs. For WIA and Wagner-Peyser programs, DWD ensures that all policy directives to local partners and staff encourage integrated service delivery. This ensures high-level, non-duplicative services to customers.

Wagner-Peyser's role in the One-Stop is defined by two documents, the local MOU and the Job Service Operations Plan. Priorities include the health care industry, manufacturing or construction, and jobs that offer benefits and higher wages. The Job Service Operations Plan improves service delivery by encouraging better alignment and integration with the WIA state planning process and therefore other One-Stop programs, as well as provides a mechanism for obtaining real time performance results.

VIII. H. 2. Improvements and Technical Assistance

DWD helps local areas identify needed improvements through on-site monitoring customer satisfaction surveys, and performance measures results. Technical assistance is provided as needed to address performance deficiencies and to advance

the knowledge and skills of local staff responsible for delivery of program services. Single site issues are dealt with on an individual training basis, while multi-site issues are dealt with through group training. For example, certain WIA program performance measure challenges may be dealt with through delivery of a statewide performance measure data summit.

VIII. H. 3. Additional Mandatory Partners

Wisconsin's primary TANF program, W-2, and the Food Stamp Employment and Training (FSET) program are mandated One-Stop partners. The W-2 and FSET programs are physically integrated into the Job Centers throughout the state either on a co-location, itinerant-staffed or network basis. While the level of physical integration varies throughout the state, all W-2 agencies, which currently administer the W-2 and FSET programs through the W-2 and Related Programs contract, are expected to coordinate with other Job Center partner programs in their WDA to maximize programmatic resources and eliminate duplication of services. Referral to other Job Center programs and dual-enrollment of appropriate individuals ensures that W-2 participants and FSET participants have access to the spectrum of services available through Wisconsin's workforce development system. As a means to augment coordination across partner programs, WDBs include a W-2 agency representative. Likewise, agencies that are selected to administer contracts for the W-2 and related programs must provide an opportunity for the area WDB to review and comment on their W-2 and Related Programs Plan.

VIII. I Oversight and Monitoring Process

DWD has four staff called LPLs and 11 WDBs. Each LPL is assigned specific WDBs for which they provide WIA program oversight, technical assistance and monitoring to achieve Wisconsin's vision and goals of continuous improvement of the WIA Program.

Criteria guiding their roles include:

- Compliance with program policies and procedures and operation within the parameters established by WIA Law, Federal Regulations, and DWD's *Workforce Programs Guide*;
- Provision of quality services to jobseekers and employers according to the approved State WIA Plan and local WIA plans;
- Entry of valid data into Wisconsin's WIA participant tracking system called ASSET;
- Provision of accurate eligibility determination and supporting documentation in case files;
- Performance outcomes are at the meet or exceed level;
- Provision that case file documentation meets DOL requirements for annual data validation;
- Provision that WDBs are implementing corrective action steps identified in DOL audits, state monitoring reports, and corrective action plans for certain WDBs that did not meet their WIA negotiated performance measures;
- Provision of appropriate expenditure levels for grants; and
- Compliance with all program policy, including priority of service for veterans.

LPLs complete the following oversight and monitoring activities and procedures on an ongoing basis to ensure the above criteria is being met (see the WIA Program Monitoring Guides, Attachment H):

- Attendance at local WDB meetings, WDB subcommittee meetings, One-Stop Center meetings, and case managers' meetings;
- Review/approval of/sign-off of local WIA plans and modifications and subsequent grant awards;

- Certification/recertification of local WDB member composition;
- Review/approval of the WDBs' local service delivery policies;
- Provision of technical assistance to WDBs;
- Review of WIA expenditure levels;
- Review of WIA performance outcomes;
- Assistance in annual renegotiation of performance measures;
- Review and approval of ASSET data changes that are impacted by policy and performance;
- Attendance at monthly meetings with DWD policy staff to relay local WDB issues and to collaborate on plans for resolution;
- Participation in DOL monitoring visits; and
- Review and approval of corrective action plans if required of the WDB and follow-up to ensure corrective action steps are resulting in improvement.

LPLs complete formal on-site monitoring of their assigned WDBs on an annual basis through the following procedures:

- Monitoring guides are developed and revised on an annual basis depending on criteria described above;
- A monitoring survey is sent out to WDBs to complete and return to their LPL at least three weeks prior to the on-site visit;
- LPL completes a desk review of the monitoring survey and attachments submitted by the WDB, conducts on-site program interviews with WDB staff, and reviews randomly selected adult, dislocated worker, and youth participants' case files and their corresponding ASSET records;
- LPLs issue a monitoring report to the WDB within 30 days of the on-site review. Findings, observations, and comments are included in the monitoring report. Findings include required actions to be taken by the WDB to correct the situation. The WDB is required to respond in writing to acknowledge and specify their corrective action steps;
- LPLs monitor to ensure the corrective action is implemented; and
- LPLs produce a final summary of monitoring results; these results are shared with state managers and policy staff. Technical assistance, training efforts, and policies are then produced in accordance to needs and issues identified during the monitoring process.

Beyond ongoing fiscal oversight, the DWD conducts monitoring of each WDB's administrative controls and procurement practices. This includes such areas as cost allocation, sub-contracts, single audit, WDB policies and controls, direct labor and costs charged by WDBs, fiscal reporting practices, and procurement methods. Reviews may be on-site or desk top. DWD determines the type of review based on prior audit/monitor results, amount and type of funds and size of agency.

The DWS Equal Opportunity Specialist and the Equal Opportunity Program Specialist provides ongoing civil rights oversight of the WDBs. This is done through desktop review of the Equal Opportunity MOA Documentation as certified bi-annually by the DOLs Civil Rights Center. WDBs receive an on-site monitoring visit at least once every two years. Each year DWS monitors approximately half of the WDBs and the next half the following year. DWS has adapted the National Association of State Workforce Agencies, Equal Opportunity Committee Monitoring Review Guide to conduct these reviews.

In addition, LPLs conduct monitoring of TAA programs and assist the DWD Dislocated Worker Section in monitoring National Emergency Grant (NEG) grants. By having LPLs involved in the monitoring of all dislocated worker related programs, DWD can ensure that TAA and NEG are appropriately interacting with WIA Dislocated Worker Formula and Special Response grants.

Items monitored include service delivery, number of participants served and placed, performance outcomes, etc. NEG grants are monitored at 90 days after start up and again at six months. Reports are completed by the LPLs and shared with the Dislocated Worker Section and local WDBs. LPLs ensure that any findings requiring corrective action are resolved. Attachment H includes the various monitoring guides discussed above.

VIII. J. Grievance Procedures

The grievance procedure is Attachment I.

VIII. K. Policies and Procedures for Effective Local Systems

VIII. K. 1. State Guidelines for Selection of Providers by Local Boards

One-Stop Operators (OSO) in each local area are designated and certified by the WDB with the agreement of the CLEO. The OSO is designated or certified through a competitive process or under an agreement between the WDB and a consortia of entities that includes at least three or more of the required One-Stop partners identified at Sec. 662.200. (WIA sec. 121(d)). The local WDB may be designated or certified as the One-Stop operator only with the agreement of the CLEO and the Governor. Wisconsin's vision, consistent with DOL guidance, is for WDBs to provide strategic planning and direction for the workforce investment system within the WDA. This vision does not include boards providing direct WIA Title I-B services or being the OSO. Therefore, DWD has provided guidance to local areas on this issue in a policy and procedure which outlines the criteria by which local areas can seek the Governor's agreement to provide direct services. No WDBs are currently providing direct services as defined by this policy.

VIII. K. 2. Impasse Procedures

DWD emphasizes full and effective partnerships between local WDBs and Job Center partners. WDBs execute an MOU describing each partner agency's role in addressing the workforce issues identified in the plan. Local areas may request assistance in negotiating the MOU from DWD or the state agency responsible for administering the partner program, the Governor or other appropriate parties. Local negotiation efforts that have taken place must be documented at the time of the request. In situations where a required partner has not signed an MOU, the following procedures have been developed per WIA regulations:

Process to Resolve Impasse Situations

In situations where a required partner has not signed an MOU, the following procedures have been developed per WIA regulations:

- **Initial Report of Impasse.** The WDB jointly with the CLEO and the affected partner must report in writing that an impasse has occurred to:
 - The State DWD;
 - The State agency responsible for administering the partner's program, and if there is no administering agency at the state level, then to the appropriate federal agency; and,
 - The State Council Ad Hoc WIA Committee on behalf of the Council and Governor.
- **Report Requirements.** This written notification must include:
 - Which partner/agency(s) are involved,
 - What WIA services are involved,
 - What the specific issues of disagreement are,

- Documentation of negotiations and what efforts have taken place to reach agreement that demonstrate a good-faith effort of both parties; and,
- Written acknowledgement that this notification begins a five-working-day "best efforts" period in which the parties will continue to make good faith efforts to resolve differences. This five-day period will precede active state-level intervention. If an MOU is completed within this period, both parties and the CLEO will notify the parties in 1 a-c above.
- **First Level-- Informal Discussion at the State Level.** Upon initial receipt of the written notification, the involved state agencies will proceed to schedule meetings that would begin after the five-working-day "best efforts" period. DWD will make this the highest priority and a review team will:
 - Request any additional documentation from the local parties and involved state agencies within three working days of receipt of the report.
 - Prepare options for resolution at the first state level meeting with involved partners.
 - Convene meetings and attempt to resolve the impasse.
- **Formal Negotiation at the State Level.** If after five days at the informal discussion level, the impasse has not been resolved, then an impartial entity, such as the Wisconsin Employment Relations Commission, will be enlisted to negotiate between the parties.
- **No Resolution.** Failure to execute an MOU by July 1, 2000, will result in:
 - The Governor and the responsible state agency must report this to the Secretary of Labor and to the head of any other Federal agency with responsibility for oversight of a partner's program.
 - The involved partner will not be permitted to serve on the WDB, and
 - The local area in which a WDB has failed to execute an MOU with all of the required partners will not be eligible for State incentive grants awarded on the basis of local coordination of activities under 20 CFR 665.200(d)(2).

VIII. K. 3. Local Board as Service Provider

DWD has been clear with the WDBs regarding the limited conditions under which a local board may provide services directly. Currently, no WDB is providing direct services.

VIII. K. 4. Training Providers Performance Information

Wisconsin follows what is written in WIA section 122(h)(2) concerning the collection of performance information from training providers of on-the-job and customized training. It gives the Governor discretion to decide if performance information will be collected. Wisconsin does not require this information be collected.

VIII. K. 5. Reallocation

The state has a process in place for recapturing and reallocating funds. If a WDB is below the 80 percent obligated at the end of year one, reallocation will occur. The amount recaptured must be based on the amount by which the prior year's unobligated balance of allocated funds exceeds 20 percent of that year's allocation for the program, less any amount reserved for the cost of administration (up to 10 percent).

Funds not fully expended after the end of the two-year grant period will be deobligated. The Division will issue these recaptured amounts as additional WIA grants to WDBs that have expended all their funds during the two-year grant period and will be able to expend the additional funds by the end of the third year of the grant. DWS allows grantees 60 days to close their grants. The recapture process will occur after this 60-day period.

VIII. K. 6. Transfer Funds Authority

This transfer of WIA funds will be treated similarly to other budget modifications. The WDB must submit revisions to its program plan, client data and budget. The state will review the modification and either approve or deny it. There is an edit in the DWD fiscal system that does not allow transfers to exceed the percentage allowed by law. This procedure is also noted in the *WIA Workforce Programs Guide*.

VIII. K. 7. Special Needs Populations

The basic structures for serving populations with special needs are addressed through a comprehensive and affiliated Access Point of Services Job Center delivery system and demand-driven strategic partnership planning structure. In serving groups with special needs, Wisconsin's WIA policies and procedures follow:

- Provide tools and strategies to strive towards universal access to core services under WIA: Key areas addressed are language, physical disability, geographic location, cognitive barriers, reading level and economically disadvantaged;
- Develop plans to address areas lacking accessibility that will not be implemented immediately due to undue hardship or lack of feasible solutions;
- Emphasize monitoring by WDBs to ensure special needs groups are receiving adequate level of service;
- Provide technical assistance on assessment services to guarantee that solutions for barriers to employment are addressed;
- Promote increased referral of displaced homemakers to Carl Perkins Technical College Program by Job Centers;
- Explore strategies to continue to deliver Disability Program Navigator Initiative services in local Job Centers to assist people with disabilities in gaining and retaining employment;
- Explore partnership issues related to development of information and referral systems and coordinating outreach efforts to underserved populations;
- As mandated by WIA 188, Job Centers will provide effective communication. Staff will participate in annual training to ensure familiarity with the variety of auxiliary aids and formats available to consumers as well as ways to respectfully communicate directly with the person with the disability;
- Job Centers will ensure that all consumers receive a comprehensive list of communication resources and formats available to help enhance universal access to the following materials:
 - The orientation/intake process;
 - Marketing/recruitment/orientation materials;
 - Handouts and brochures;
 - The One-Stop's website; and
 - Alternative formats (tapes, Braille, etc.).
- Job Centers must ensure that marketing and recruitment strategies encourage individuals with disabilities across the full spectrum of physical, mental, cognitive, and sensory disabilities to seek services or apply for employment.

VIII. K. 8. Sixth Youth Eligibility Criterion

The state has not established additional eligibility criterion. Local Boards have developed their own policies included in the Local Plans.

IX. Service Delivery: Approaches

IX. A. One-Stop Service Delivery Strategies:

IX. A. 1. Service Provision by Each Partner

The Job Center MOU describes the services offered in the Job Center and includes partner programs' roles and responsibilities for the delivery of those services. The *Job Center Service Standards* provide state direction on how the OSO and its partners will deliver services.

IX. A. 2. Youth Formula Programs

All Wisconsin Job Centers provide access to youth services whether the youth provider is located in the center or not. Each resource center located in job centers has an area dedicated just for youth.

Several WDBs have developed youth specific resources and/or programs in the Job Centers. For example, Job Centers in Fox Valley WDA have web sites geared towards youth. The Oshkosh Job Center in the Fox Valley WDA provides training specifically to incarcerated individuals before they are released from the correctional facility. The Milwaukee County PIC has a career center/resource room specifically for youth.

DWD continues to focus technical assistance efforts to encourage more youth services provision in job centers. State sponsored roundtables have provided opportunities for job centers with best practices to share their materials with others.

DWD and the local WIA youth program managers have met several times to discuss how to improve accessibility to youth services at the Job Center. The following policy suggestions were incorporated into the criteria for comprehensive Job Centers:

- Provisions for assisting youth programs into the MOUs of One-Stop partners;
- Provide separate, well-identified areas in the Job Centers just for youth;
- Provide a bulletin board to post workshops and training opportunities or other information just pertaining to youth;
- Create a website devoted to youth;
- Job Center resource rooms have materials and resources that are appealing to youth; and
- Require youth service providers to bring youth participants into the Job Centers to use JobNET, Career Education tools, and be trained on resume writing, grooming for the workplace, interviewing, employment skills, self-management skills, transferable skills, and where to find labor market statistics; and
- Teach youth financial literacy skills, including the wise use of credit and building financial assets.

IX. A. 3. Minimum Service Delivery Requirements

Performance accountability and continuous improvement are key elements of the WIA and the Job Center delivery system. The *Job Center Service Standards* (Attachment J) serve as the foundation of services offered in Job Centers in Wisconsin and guide service delivery in all centers. The OSO is responsible for Comprehensive Job Centers (CJC) and their affiliated Access Point of Service (APS) meeting the standards. Implementation of the standards began July 1, 2006, and expectations are that all CJsCs must meet all the standards by June 30, 2007.

The Job Center system in each local area must include at least one comprehensive physical center that provides the core services applicable to each partner's program and must provide access to other programs and activities carried out by the Job Center partners. Comprehensive Job Centers must be certified by the WDB, using the *Criteria for Certifying Comprehensive Job Centers* (Attachment J). Finally, every APS must be affiliated with a CJC and be part of that CJC's MOU.

IX. A. 4. Tools and Products

DWD supplies Job Centers with automated tracking systems, customer information and marketing brochures, and Job Center staff training. Some of the products are:

IT Products

- ASSET: an automated case management system used for tracking program services and outcomes of individual customers;
- JNB to track services to business;
- Case Manager's Desk Reference (CMDR): enables case managers to identify individual customer participation in a variety of related programs;
- WisCareers: allows individuals access to career assessment and development information (unless additional funding is found, DWD will not be able to provide this service after July 1, 2007);
- WORKnet: enables individual customers to access labor market and occupational information, business access to information about the labor market and economy and researchers to access labor market information and historical data;
- JobNet: allows business customers to post job openings state wide (and through the link to America's Job Bank, nationwide) and allows individual customers access to posted jobs;
- Data Warehouses for Job Centers to get reports about program participation and performance;
- The state eligible training provider list: allows individual customers and case managers to make informed choices about potential training providers;
- Accessible Workstations: These disability adaptive computer workstations enable persons with disabilities to access all products more easily;
- wisconsinjobcenter.org: This website is a link site to a wide variety of workforce development tools for individual and business customers as well as Job Center staff; and
- Provide the data lines to all comprehensive Job Centers and some APSs.

Customer Brochures (examples only, not a complete list)

- Fair Employment Law Series (for business and individuals);
- Guides to Selecting a Child Care Provider;

- Earned Income Tax Credit Information (for business and individuals);
- Work Opportunity Tax Credit Information (for business and individuals);
- Reference Guide to Information Needed to Complete a Job Application; and
- Resume Tips.

Training

- Resource Room Training 101 & 201 (Job Center staff);
- Career Development Training (Job Center staff);
- Using LMI Tools (Job Center staff);
- Labor Law Clinics (business);
- The Jobs Revolution (business);
- Job Development Symposia (Job Center staff);
- Working with Offenders (Job Center staff);
- Using JNB (business and Job Center staff);
- Money Smart (individuals);
- The Money Conference (individuals); and
- Workforce Development Roundtables.

IX. A. 5. Models/Approaches

DWD promotes consistency of service across Job Centers through service standards and outcomes; by providing automated systems for service tracking; and by providing training on the roles, responsibilities and practices Job Center staff should employ in the conduct of their job. In an effort to refocus Job Centers, DWD expects each CJC to meet the criteria for a CJC to be eligible to receive DWD resources (staff, rent, IT, etc.). DWD may consider innovative alternate models of service delivery.

IX. B. Workforce Information

IX. B. 1. Integration at State and Local – Describe How the State will integrate Workforce Information into its Planning and Decision Making at the State and Local Level, Including State and Local Boards, One-Stop Operations, and Case Manager Guidance.

The first charge to the CWI is to “promote the use of economic and labor market information to ensure evidence-based policy recommendations to guide the state’s broad workforce development system.” To highlight the importance of this key charge, CWI members and its three standing committees identified their data needs. DWD developed a CWI Data Resources binder that included:

- Industry and occupational projections information with a special section on healthcare and IT occupations;
- Labor Market Information Resources (Quick Reference Index);
- DOL Funding for Midwest States (March 2004 report excerpt);
- Primer on the WIA; and
- University of Wisconsin report on declining federal funds.

DWD is also considering a plan to produce labor market information reports according to economic regions so that WDBs have a way of considering their operations in a framework besides geographical boundaries. From a case management standpoint, more effort will be spent on helping job seekers understand the labor market in which they are seeking employment including identifying the employers that have high wage/high demand jobs and the skill requirements for those jobs.

Through *Grow Wisconsin* the state has already identified several high growth/high wage areas that DWD and other state agencies will focus on in workforce and economic development efforts.

IX. B. 2. Dissemination of Information

The broad strategic approach that DWD follows for the delivery of workforce information to principal customers is to make local workforce information available through easy-to-use electronic delivery systems, and to assure the data can be easily reproduced for use by customers. Interpretation of data, guidance, and answering customer questions will be a primary focus for DWD local labor market and research analysts. DWD continues to provide workforce information via printed copy for those customers who are unable to access electronic data.

The secondary strategic approach for workforce information delivery is the ongoing commitment to understanding customers' needs. DWD will continue to interact with local WDBs and statewide workforce investment customers to understand gaps in the data. We also will continue to work with the state's LMI Customer Guidance Committee to assure their concerns are addressed. Finally, we will develop a survey method that provides DWD with a tool that takes into account the needs of principal customers.

Each of Wisconsin's 78 Job Centers has a Resource Room that is the locus of the WIA's core services. Within the Resource Room, job seekers have access to both electronic and hardcopy tools to research career decisions and to assist in their job search. The hardcopy tools available include occupational reference books, occupational briefs, career-related periodicals, occupational biographies, and videotapes. Other types of materials that are available include assessment instruments, employment data, and transferable skill information. In addition, each Resource Room has a staff person who has received at least five hours of training on using labor market information and related occupational information to help job seekers in their career search.

Labor market information is disseminated to Job Seekers, Employers and Workforce Development professionals through Wisconsin's new website, WORKnet. The URL is <http://worknet.wisconsin.gov/worknet/>. The site is being publicized through industry specific marketing, including posters and pamphlets.

Job Center staff has been trained to use WORKnet and other LMI tools for use with both Employers and Job Seekers through a series of DWS sponsored Roundtables and a training program entitled "Using LMI Tools."

IX. B. 3. Core Products and Services Plan – Describe how the state's Workforce Information Core Products and Services Plan is aligned with the WIA State Plan to ensure that the investments in core products and services support the state's overall strategic direction for workforce investment.

- **Continue to Populate the America's Labor Market Information System (ALMIS) Database with State Data**

WORKnet, Wisconsin's ALMIS database brand name, is a key new tool in our workforce information system. It provides an attractive, data-rich but user-friendly resource for job seekers, employers, workforce professionals, and economic

developers to help us *Grow Wisconsin* and make the best investments of our scarce public resources.

- **Produce and Disseminate Industry and Occupational Employment Projects**
State government agencies use projections data and analyses in the evaluation of existing, and in the development of additional, training programs such as those offered by the Bureau of Apprenticeship standards, the Division of Vocational Rehabilitation (DVR), and the DOC.

Wisconsin Technical Colleges, the University of Wisconsin, and several of the state's private colleges use projections to aid in the development and evaluation of their curricula.

Projections tailored to WDAs are used by WDBs to make decisions about training dollar allocations. Guidance and career counselors, students, and job seekers use the projections to explore occupations and careers. Researchers use the data in their analyses of Wisconsin's labor market, and employers use the data as indicators of demand for various occupations.

Projections staff provide training on projections products to local WIA planners, program managers, employer services staff, and case management supervisors. The purpose of the training is to facilitate better understanding of projection products and how to use them.

- **Provide Occupational and Career Information Products for Public Use**

Occupational Employment and Wage Publications

The Office of Economic Analysis (OEA) in DWD was established to assist economic data users to better understand the relationships between labor markets and other economic and demographic specifics. OEA helps users interpret labor force data and focus on the issues and trends influencing employment growth in Wisconsin.

OEA publishes monthly and annual reports that provide an overview of county and state trends. These include *Workforce Observations*, *County Workforce Profiles* and *Regional Occupational Projections*. Additionally, the OEA works with the CWI to develop information for use in guiding the goals and strategies of CWI.

Since the re-formation of the CWI, the OEA has collaborated with them to develop necessary statistics to measure the impact of workforce investments. Among the pieces developed was a quick reference index of workforce information sources to be used by the CWI committees in the establishment of measurable goals.

- **Ensure that Workforce Information and Support Required by State/Local Workforce Investment Boards are Provided**

State/Local WDB Support

This activity supports the changing workforce system focus described in Section A of this plan. It also supports the state's economic development plan and the Governor's charge to the CWI to:

- Promote the use of economic and labor market information to ensure evidence-based policy recommendations to guide the state's broad workforce development system;
- Recommend policies to strategically target state training and education resources;
- Foster and support public-private partnerships and intergovernmental cooperation and coordination in the building of Wisconsin's workforce; and
- Develop and implement initiatives that invest in Wisconsin's workforce and establish measures to monitor progress towards achieving objectives.

Silver Platter Web Site Access

The Silver Platter web site allows Job Center staff access to an online version of *Mental Measurements Yearbook* published by the Buros Institute so that they can determine the appropriateness of assessment tools.

- **Maintain and Enhance Electronic State Workforce Information Delivery Systems**

WORKnet and video streaming fit into the goals of the WIA five-year plan by providing a seamless interface of services that will be accessed by employers, members of the workforce, and their families. Because of the organizational structure of DWD, multiple entities within DWD provide information and support to the Job Center system. Video streaming will integrate the information produced throughout the DWD and will deliver it with one façade to customers, increasing both the accessibility and usability of the information.

- **Support State Workforce Information Training Activities**

Accessible Workstation/Maintenance & Training

This is an ongoing project that provides people with disabilities the opportunity to link to core services of the Job Center system, including labor market information.

A basic tenet of WIA is universal access; ensuring electronic labor market information is available to people with disabilities is key to universal access. This project will train local staff on the use of the technology that meets the needs required under WIA section 188.

IX. B. 4. Information Products and Tools

Electronic delivery is key in the 21st century and will be the cornerstone of the state workforce information delivery system. DWD will maintain responsibility for statewide electronic system development and interfacing between systems. Enhancements will be based on customer feedback, the ongoing development of systems, and the availability of new information sources. Much of the new demands will be based on targeted industries and the need to develop, collect, or find information on the new and emerging workforce needs and skills required. National electronic workforce tools such as the Workforce Information Database (WID) and the Occupational Careers Videos are critical to this success.

WORKnet is DWD's interactive web query application that has been developed as the front end piece for the WID. This new demand-driven site will be used to dispense timely and accurate labor market information to support *Grow Wisconsin*. The future direction of WORKnet will increase focus on providing substate-level skills data to citizens of Wisconsin, emerging industries, and industry cluster profiles. The WID will be enhanced to include a broader array of economic and workforce indicators so that customers have access to up-to-date, sub-state data from multiple information sources.

Both individual and business customers can easily access Career Voyages, America's Career Information Network and the rest of the Career One-Stop from the wisconsinjobcenter.org web page. Customers are encouraged to use these tools to supplement those developed by DWD. DWD is committed to the development and continuous improvement of reporting/information brokering systems not only to keep pace with federal requirements but, equally important, to provide customers, direct services staff and managers with state-of-the art tools.

IX. C. Adults and Dislocated Workers

IX. C. 1. Core Services

IX. C. 1. a. Universal Access

A guiding principle of Wisconsin's Job Center system is to ensure adults and dislocated workers have universal access to core services. This includes, at a minimum, all of the services identified in WIA section 134(d)(A) – (K). They are offered in an integrated manner and not by program funding. They are also accessible by either self-service or limited staff assistance. Through self-service, they can be accessed directly at the Job Center or through the Job Center's website. Resources include a listing of weekly workshops, job fairs, publications, information on nontraditional occupations, JobNet, and community resources (medical, childcare, food, housing, etc.).

Wisconsin's Job Center will establish yearly assessment strategies to improve upcoming programming and services. Assessment strategies will focus on the following areas: attendance/enrollment outcomes in WIA programs, effectiveness and demand for core/auxiliary programming/services, trends in local labor market and occupational information, and local demographic information.

One-Stops must make a conscious effort to enhance universal access to services for individuals with disabilities and minority individuals through targeted outreach efforts with community/civic organizations and partners, the school system, various media resources, local businesses, and other public forums.

One-Stop facilities must develop strategies and resources for offering any/all interested individuals the opportunity to learn about and become more acquainted with existing resources, programs, and services as well as availability of auxiliary aids and formats. This includes assistance with operating computers and work stations, accessing printed information.

Strategies to ensure universal access for adults and dislocated workers focus on two concepts:

- Offer a variety of resources to respond to the diverse needs of adults and dislocated workers seeking help from job centers, and
- Train job center personnel in skills needed to enhance the availability of these resources.

Different sections of the state plan have commented on and explained Wisconsin's strategies in support of the above focus. They include the following:

- IX.A.3. identifies the minimum services and resources available to adults and dislocated workers through job centers,
- IX.A.4. details the tools and products that are available. It lists and explains IT Products such as the website wisconsinjobcenter.org., and WORKnet (Wisconsin's premier resource tool). It also identifies a sampling of brochures that are available;
- IX.B.2. talks about the strategies that are used to present available resources. This includes Job Center Resource Rooms that are available in all 78 job centers. Within these rooms job seekers have access to "both electronic and hardcopy tools" to assist with career decisions and job search activities. What is not mentioned in the plan is staff for these resource rooms receive ongoing training in how to assist customers in using the resources. The rooms also include accessible workstations to enable persons with disabilities to access all resources more easily, and
- VII.B. talks about refocusing direction of Job Centers including offering staff training on using LMI in service delivery. This coincides with the introduction of WORKnet's increased capabilities for offering LMI to adults and dislocated workers.

Another strategy is to offer assistance in obtaining jobs in areas society considers nontraditional for women and men. These resources are not just for the job seekers but are also for job center staff. The website <http://dwd.wisconsin.gov/dws/manuals/nto/default.htm> provides tools for job center staff to use in developing brochures and implementing techniques that promote equitable access to all jobs regardless of gender.

The term "integration" is used in this section to describe how information about all programs is provided through job center staff. Job center staff provide information on all programs regardless of the funding source for their position.

IX. C. 1. b. Three-tiered Service Delivery for Labor Exchange Services

DWD is responsible for planning, administering, and making available high quality self-service, facilitated self-help, and staff-assisted public labor exchange program services to all job-seekers and businesses in Wisconsin.

The hallmark of Wisconsin's effective public labor exchange operations is high volume, information brokering services available to all One-Stop customers. It helps job seekers plan strategically and provides career guidance to an increasingly higher skilled workforce. Businesses are able to connect with educated and prepared job seekers committed to life-long learning.

In Wisconsin, all Job Service staff are integrated into One-Stop facilities that manage and provide core services to job seekers, and recruitment services, including job order servicing, to businesses. This field structure is linked and supported by a network of Internet-based public labor exchange technologies that strive to reduce the need for physical infrastructure while still reaching out to customers requiring assistance. As a result, Job Service operated public labor exchange information-brokering services are also readily available to businesses and to job seekers wherever they can access the Internet.

Self Service

In Job Centers, self service occurs for job seekers who visit the Resource Room and choose to use electronic tools, primarily our job search system – JobNet – as well as available hard copy materials without consulting staff. Here, jobseekers can begin the process of talent development, including: exploring careers, learning about trainings, and reviewing job opportunities. JobNet also allows a growing number of citizens to access the system at anytime, from anywhere, and provides the business community with the ability to directly enter job postings for recruitment.

Facilitated Self Help

For Job Seekers: Resource Rooms are the setting for facilitated self-help in Wisconsin's Job Centers. Job Service is the lead agency and primary provider of Resource Room services. When requested, or observed, Resource Room staff offer:

- Personalized staff assistance in the effective use of a growing array of electronic job search and career planning-related systems and hard copy materials;
- Assistance when requested or when staff observes a need; and
- Customer service representatives in the Resource Room who:
 - are computer literate;
 - have comprehensive knowledge of the local labor market;
 - understand career planning;
 - are proficient in successful job search strategies and recognize potential eligibility for other One-Stop system services;
 - direct job seekers' attention to jobs for which they may be qualified and make referrals as appropriate based on their knowledge of the labor market in general and specific listings that reflect current recruitment activities; and
 - share their expertise with customers and, in return, customers keep staff knowledgeable about who is looking for work and how best to present job opportunities.

For Business: Job Service functions as a provider of high volume recruitment services to the business community. Job Service Wagner-Peyser funded staff service job orders that are displayed on Wisconsin's JobNet system. Without a large and diverse selection of current job openings, the value of Job Centers would lessen. Wagner-Peyser staff who provide business services may:

- Provide businesses with recruitment services, as well as related staff and partner training; and
- Offer facilitated self-help, in relation to job postings (orders), which is the assistance that Job Service staff provides to businesses that list their own orders on a direct entry system.

Staff-Assisted Service

For Job Seekers. Declining Wagner-Peyser funding continues to impact the availability of staff-assisted services beyond the Resource Room. Consistent with this reality, Job Service continues to provide services, such as:

- Reemployment Services to UI Claimants, in collaboration with local partners;
- A variety of job search and career planning workshops for the general public; and
- Employment counseling and testing, both of which are highly valued by the customer community, and important to addressing vocational choice, change, and adjustment faced by dislocated workers, youth and older workers. This service is of great value to businesses for recruitment, and as a direct service to their establishments in matters of workforce retention, particularly during this time of labor shortages.

For Business. This level of service to employers is expected to undergo change, as Wisconsin looks to streamline service delivery and increase flexibility. By improving its public facing systems, Job Service staff will be able to better assist with the labor exchange services of: recruitment planning; information brokering; screening and referral; quality job order writing, and talent development and retention strategies. Via a Job Service organizational plan model of key strategies and tactics, efforts will be designed and enhanced to secure the business of employers, facilitate jobseeker employment, and achieve the "bottom line" goals of Job Center-based programs operated by Job Service.

IX. C. 1. c. Integrated Resources

DWD requires each WDA to develop an area-wide plan and strategy that outlines how partner agencies will use resources to meet the individual, business, and economic growth needs of the area by employing a system-based, regional approach.

Within Job Centers, resource integration is managed through a MOU, an Operating Agreement and a Facilities Plan. A vision for Wagner-Peyser's role in the local workforce system has been established through the development of the Job Service Bureau's Operations Plan that dovetails with the local WIA planning efforts in each WDA.

IX. C. 2 Intensive Services

Intensive services are guaranteed to all adults and dislocated workers visiting Wisconsin Job Centers who need more specialized or individual services, are designated eligible for WIA, and have received at least one core service in the past.

Intensive services consist of, at a minimum, the services identified in WIA Section 134(d)(3)(c). To give flexibility to the sometimes rigid line between intensive and training services, the Subsequent Eligibility Workgroup, described earlier in the plan, developed policy guidance that expands the definition of training under Intensive Services. They drew from local policies in the State of Georgia that clarified training activities under prevocational services. Their recommendations were adopted as Policy Update 02-07:

Short-term prevocational activities to prepare individuals for employment or training including:

- Development of basic learning, communication, and interviewing skills such as punctuality, personal maintenance and professional conduct skills; and
- Development of occupational literacy skills to complete a training program or class. This includes basic computer classes such as Microsoft Word, PowerPoint, and Excel.

Short-term prevocational activities for workers who possess a body of knowledge with specific skills, but lack occupational credentials or require short-term continuing education or occupational training offerings.”

Another strategy under consideration is to explore how to increase soft skill training under intensive services. By increasing access to soft skills training, adults and dislocated workers will improve their ability to benefit from specialized skill training under intensive services and under the training (Individual Training Accounts, On-the-Job Training (OJT) and Customized Training). State and national studies point to the importance of job seekers having soft skills to obtain and retain a job.

IX. C. 3. Training Services

IX. C. 3. a. Governor's Vision for Increasing Training Access and Opportunities

The Governor's vision for increasing training opportunities for individuals is summed up in *Grow Wisconsin*: “It is not about creating jobs; it is about creating **good** jobs that support families.” To reinforce this notion as discussed earlier, WDBs are required to spend at least 35% of their formula funds for training and training supports in health care or other sectors/industries for which there is some evidence of significant growth and opportunity in good-paying jobs. This notion becomes especially important to low-income families who need more than “any job” to begin to pull themselves out of poverty. In many cases they need to prepare themselves for an entry-level job that is the first rung on a career ladder, so that through additional training and experience they can raise their standards of living and begin to build financial assets. The department implemented the 35% High Wage Job Training Requirement in PY2006 (Attachment K is the Administrator's Memo).

IX. C. 3. b. Individual Training Accounts

IX. C. 3. b. i. Policy Direction

Grow Wisconsin gives direction to all training activities in the state including WIA programs and Individual Training Accounts (ITAs). It charges DWD to work with WDBs to allocate training funds “to increase the job skills of workers to compete for and secure high-wage industry jobs.” It prioritizes key industry clusters where training dollars are to be spent.

DWD policy direction for ITAs delivers on the WIA principle of customer choice. It encourages case managers in Wisconsin Job Centers to make WIA participants the center of the decision making process when selecting a training program and provider that best meets their needs.

To support this, Wisconsin’s *WIA State List of Eligible Programs and Providers* (ETP List) and its format has been revised to improve the accessibility of the information therein to WIA training seekers, their case managers, and to the training provider. For the latter group, DWD’s intent is to reduce barriers to the eligibility process. The central objective is to create and maintain the most comprehensive ETP List possible that offers ITA training voucher holders a broad variety of quality training choices.

IX. C. 3.b. ii. Innovative Training Strategies

In addition to broadening the scope of training and ITAs, *Grow Wisconsin* focuses on building partnerships with business, education, economic development and industry associations.

It also includes a commitment to developing innovative training and funding strategies for ITAs and other WIA training tools. Currently, there are a number of innovative training and funding strategies underway. They include:

35% High Wage Job Training Requirement

For PY2006, DWD implemented the requirement that WDBs must spend 35% of their formula allocated funds for Adult, Dislocated Worker and Special Response programs, less the 10% for administration, on training and supports leading to high wage jobs. Determination of whether the training qualifies for the 35% requirement is made by comparing the median wage for the recent graduates of a particular training to the median wage for the WDA. Allowances are made for a “Career Ladder” if a customer is low-skill, but strongly motivated to get a higher skill, better paying job through a series of steps. The first step

training will count towards the 35% goal if the following conditions are met:

- a) The WDA determines, through assessment and counseling, that the customer is a good candidate for a long-range plan leading to a higher skill, better paying job;
- b) The Employability Plan outlines the various steps and goals in the career ladder;
- c) The WDB is willing to follow the customer and support their efforts to reach the long-term career goal.

College Boot Camp for Training Workers

At the Gateway Technical College in Racine, Wisconsin, a boot camp prepares workers to be machine tool/CNC operators. The intense training includes classroom work and hands-on lab five days a week at 40 hours a week for 14 weeks. This effort is partnership between Gateway, the Racine County Workforce Development Center and the Kenosha County Job Center. By aligning and integrating the education and training supply chain across workforce development, technical colleges, and employers, this effort helps ensure Wisconsin companies remain competitive in the global economy and workers have access to high-wage, high-demand jobs with career pathways.

Career Pathways

Through our RISE project and other initiatives we will work to build industry-driven career pathway models to ensure that low skilled adults have the opportunities to increase their skills and wages.

Section 503 Incentive Grant projects

Wisconsin was one of the states that qualified for incentive grants under Section 503 of WIA. A portion of the money received, \$640,000, is being used to fund four innovative projects that:

- Demonstrate collaborative partnerships in planning and service delivery led by Workforce Development Boards (WDB), technical college districts and Tech Prep Consortia;
- Build a stronger skilled workforce that can adapt and work in a skill based workforce environment;
- Implement workforce system improvements that outline best approaches for workforce participants; and
- Establish economic development and growth for Wisconsin by helping transition the state and local economies for traditional manufacturing to high-level skilled, advanced manufacturing environments.

The four projects are the South Central/Southwest *GROW Regional Partnership*, West Central Wisconsin *Manufacturing Skills Academies*, North Central Wisconsin *Manufacturing Academy*, and Regional Workforce Alliance Southeastern Wisconsin *Welding Consortium for Career Pathways*.

High Tech Manufacturing

An innovative partnership between West Central WDB and Nelson Muffler is currently underway to provide classroom and On the Job training in advanced welding and CNC machining to 60 dislocated workers. This partnership builds on the existing talent and skills of the dislocated workers and through reemployment provides economic development in the area.

IX. C. 3.b. iii Commitment to Fund High-Growth, High Demand Occupations

A key goal of *Grow Wisconsin* is to increase wages to “at or above the national average by the end of the decade.” It emphasizes that in the past the state has only focused on creating jobs “without a strategy to raise incomes.” The new focus in economic development is on high-growth and high-demand jobs. *Grow Wisconsin* commits to using “federal discretionary dollars for training current and future workers in strategic industry clusters with urgent needs and higher paying jobs, including construction, manufacturing and IT.”

IX. C. 3.b. iv. Limiting ITAs

There is no state policy that limits the duration or dollar amount of ITAs. The WDBs have local policies related to parameters of ITAs and are required to keep the state informed of their training policies, including limits to time and/or dollar amounts for ITAs.

IX. C. 3.b.v. Apprenticeship

Apprenticeship is a time-honored, highly successful training program that owes its success to the involvement of the many partners who use the apprenticeship method of training for their skilled workforce. Apprenticeship programs are operated by both the public and private sectors. Apprenticeship sponsors, who are employers, employer associations and labor-management organizations, register programs with Wisconsin.

With a key goal of *Grow Wisconsin* to increase wages to being “at or above the national average by the end of the decade,” Wisconsin’s apprenticeship program is an integral part of the Governor’s plan. The Governor has targeted Wisconsin’s economic development on high growth and

high demand jobs. Apprenticeship has targeted three industry clusters for growth: construction, health care and manufacturing.

The Wisconsin Apprenticeship Advisory Council is positioned strategically to target industries in the identified high growth industries with partner members from the high growth areas. Through the proven system of public-private partnership, apprenticeship connects employers looking for qualified workers with job seekers willing to enhance their skills. As a demand-driven, flexible approach to skills development and lifelong learning, apprenticeship is uniquely positioned to meet the challenges of the 21st century workplace.

IX. C.3.b.vi. Religious Activities

WIA Section 188(a)(3) continues to be a guide for using state WIA dollars to fund religious activities. In 2002, the state issued a policy affirming faith based organizations' right to be training providers. It emphasized access to Wisconsin's State List of Eligible Program and Providers when they meet all other state requirements.

IX. C. 3. c. Eligible Training Provider List for Broader Customer Access

The *WIA State List of Eligible Programs and Providers* is available on the Internet at the following address: <http://www.wisconsinjobcenter.org/ita/>. It is accessible through any Wisconsin Job Center or to individual training seeker with Internet access. Case managers and other service provider staff have access to ETP Lists program and provider data through the ASSET Data Collection system. The purpose of the interconnectivity of these databases is to assist case managers when compiling required training program and provider details at the time of update to a customer record.

IX. C. 3. d. On-the-Job Training and Customized Training

IX. C. 3.d. i. Vision for Increased Opportunities

Grow Wisconsin outlines a plan for raising wages and preparing the workforce for the new economy. In this plan, the Governor said, "Being able to offer free training to employers is a powerful incentive that Wisconsin lacks, making our training incentives less competitive than other states." The Governor has proposed in his budget a \$10 million training fund (GPR) to offer free training to companies that create significant numbers of new, high-paying jobs or need to introduce new technologies to retain workers in a competitive world economy.

IX. C. 3.d ii. Operational and Funding Issues

Another significant proposal by the Governor is to target dislocated workers. "Commerce has prioritized incentives toward companies paying higher wages, companies hiring dislocated workers, and creative packages that leverage additional private-sector capital. For example, Commerce will forgive loans to companies hiring recently dislocated workers and using state capital as collateral to leverage private investment."

DWD believes that on-the-job-training and customized training are appropriate tools in support of the *Grow Wisconsin* initiative. Job Center staff have received training in the BRGs approach to workforce development and in job development techniques.

WBDs are encouraged to use these training activities when appropriate. DWD has used various approaches to funding these activities with shared support from the state, the WDB and the employer. On-the-job-training and customized training programs that prepare job seekers for high-skill and high-wage jobs will count toward the requirement to spend 35% of formula funds on training and training supports leading to high-wage jobs.

IX. C. 4. Service to Specific Populations

IX. C. 4. a. Strategies to Meet Needs

To ensure that all individuals have access to the full range of workforce development services DWD established the following job seeker oriented Job Center service standards.

Job seekers have access to services that will meet their needs, including:

- Information on education, employment and training services available;
- A listing of local service providers and whether the services are available on-site or elsewhere in the local area;
- Initial eligibility information on programs available in the community for which they are eligible;
- Information on nontraditional occupations, which is made available to customers as part of their overall orientation;
- Information on pre- and post-support services needed to maintain the employment situation;
- Assessment;
- Career guidance and occupational information;
- Current job openings, the qualifications associated with these openings, and application instructions;
- Assistance with job search, including resume writing, interviewing, seeking nontraditional employment positions, using labor market information and locating the "hidden job market"; and
- Information on the UI filing and claims update processes.

IX. C. 4. b. Reemployment Services

A principal aim of the Wisconsin Worker Profiling Services System is to provide Reemployment Services to claimants who are unlikely to return to their previous jobs or occupations. These claimants are given additional assistance to facilitate an early return to employment.

Due to the ending of federal funds for Work Program Reporting System as of PY2005, state resources are now primarily responsible for funding this program. As a result, Job Service has reduced administrative costs and streamlined program policies and procedures by standardizing the program orientation and developing common system-wide program materials. Wisconsin's Re-Employment Services program operates in a system-based environment with UI. The combined efforts of the Re-Employment Services program and UI have had remarkable success which is reflected year after year in the savings of the UI trust fund.

IX. C. 4. c. UI Work Test

Wisconsin requires all UI claimants to engage in an active work search, and each must contact at least two employers per week for each week of benefits claimed, unless specifically granted a "work search waiver." The work test covers a claimant's ability to work, availability to work, and the suitability of work offered.

Providing the work test continues to be a Job Service role and a One-Stop system priority. Work test services are provided via claimant registration on JobNet (the state's on-line, self-service system for jobseekers to quickly find job openings in Wisconsin), availability of Job Center resource room resources, worker profiling/reemployment services and workshops, and information about Job Center services available to all claimants. Feedback requirements, on information that may potentially adversely affect a claimant's eligibility for benefits, are promptly reported electronically to UI Adjudication Staff.

This important function of the public labor exchange system ensures that WIA-intensive service resources are made available for rapid claimant transition to the state's workforce.

IX. C. 4. d. Integration and Alignment of Dislocated Worker Services

Wisconsin has taken numerous steps and conducts numerous activities to foster integration of TAA and WIA Dislocated Worker Services. Wisconsin's strategy for planning and implementing integration involves organizational, training and technology components. Organizational components include:

- Policy development and implementation for WIA Title I Dislocated Worker programs and the TAA program are housed in the Dislocated Worker Section of DWD. The Dislocated Workers Section developed and maintains the *TAA Policy and Procedures Manual*.
- The Dislocated Worker Section is responsible for conducting Rapid Response activity. State Rapid Response staff are trained to assess the need for filing a TAA petition. At each initial Rapid Response event, Rapid Response staff ask employers and workers if they

believe the layoffs were the result of foreign competition. They carry a supply of petitions to each Rapid Response meeting.

- All local Job Centers have information and access to information on filing TAA petitions and TAA services in their resource rooms. Most Job Centers have someone on-site trained on how to file TAA petitions.
- Local Job Service managers are required to develop written coordination agreements with each WDB. The contents of the agreements are specified in the state's TAA manual.

Training and staff development activities include:

- More than 80 Job Service staff, 40 AFL-CIO Labor, Education and Training Center staff and approximately 10 UI Division staff throughout the state have received training from the Dislocated Worker Section on how to file TAA petitions. WDB staff are also trained on the program.
- Wisconsin also sponsors a number of training sessions and informational forums that are designed to promote integration of TAA and WIA dislocated worker services. These include:
 - **New Employee Training.** This one-day session is designed for new staff and more experienced staff who work in the TAA and WIA programs. Topics include basic eligibility for both programs, services and benefits for both programs and participant reporting. Throughout the training, state policy on dual enrollment and the value of integrated services are discussed and examples of model practices are provided. The training is provided as needed to approximately 50-60 staff.
 - **Program Integration Training.** This one-day session is provided to staff that work in the WIA, TAA, Trade Readjustment Assistance (TRA) and UI programs. Similar to the new employee training, it covers eligibility requirements and services available through each program. The afternoon is spent conducting a team building and role clarification exercise. The exercise identifies specific program functions for each program and the agency responsible for carrying it out. The information is used in coordination agreements that are required for each WDA. The training is conducted as needed to groups that are typically 20-30 participants in size.
 - **State Workforce Development Roundtables.** These one-day sessions are held twice per year and attract between 120-150 people. They are designed to provide information and to share model practices for both the TAA and WIA dislocated worker staff. Workshops are provided on subjects of mutual interest to TAA and WIA dislocated worker staff. In general, topics relate to the following themes:
 - IT tools to assist state and local staff to conduct their jobs effectively.
 - Federal and state policy initiatives affecting both TAA and WIA dislocated workers.

- Promising local policies and practices that can be replicated in other sub-state areas.

Technology-based activities:

- TAA and WIA dislocated workers services and outcomes are tracked in a single, integrated reporting system. That system is known as ASSET;
- The ASSET system allows TAA and WIA staff serving common clients to share assessment, reemployment plan, case management and outcome information on common clients;
- Web Intelligence data warehouse. This data base tool allows state and local program managers to use corporate and customized reports to monitor and evaluate the level of co-enrollment and service provisions on both programs; and
- Performance measurement tracking is done using the WIA performance standards for both WIA and TAA programs. This gives the Dislocated Worker Section the ability to measure performance outcomes in both programs using a common methodology.

Wisconsin will use the \$250,000 in IT improvement fund for TAA to:

- **TAPR Improvements.** We have identified issues with 18 data elements that we need to fix or can improve for submission of the TAPR. Currently we draw data from our ASSET (Participant reporting), Reengineering Acquisition, Payment and Information Disposition Systems (RAPIDS) (Financial reporting) and UI Benefits (Eligibility and TRA Payments) systems. We have conducted an analysis of what items we need to fix and are getting cost estimates on programming and system fixes.
- **Automate the TAA employment/financial plan.** Our plan is to set up and implement an employment plan, that includes all of the elements needed for TAA, in ASSET. The employment and financial components will be based on assessment data and will all be contained in ASSET.
- **Automated TAA registration and service reporting.** We plan to create a data exchange between the UI system and ASSET. Currently the UI system captures UI and TRA eligibility and waiver data, and stores it in the UI information system. We would like to have that data transferred over to the ASSET system to create a TAA registration and if possible to transfer waiver data to ASSET.
- **Case management activity reports.** We plan to program a new set of case load reports in our data warehouse. The information will allow DWD to identify heavy/low caseload areas and to shift work among TAA case managers as needed.
- **Simplifications of TAA activity reporting.** Currently ASSET is designed to do every reporting of all services based on the WIA core, intensive and tanning services requirements. This approach has forced TAA case managers to think and follow WIA programming and reporting protocols. These conventions complicate reporting activities for TAA and result in a substantial waste of TAA staff time that would

be better spent working with claimants. We plan to redesign the reporting system to make it more TAA friendly.

- **Financial system changes.** We are considering some changes to our financial payment system, aka RAPIDS, that will make coding and payment of TAA bills for training and mileage less time consuming.
- **Call center anywhere.** We are looking at a computerized system that will allow us to set up a toll free TAA question and answer service line. The line can be used by TAA claimants to answer some of the more routine questions that come up. Questions will be routed to available TAA case managers statewide who should be able to answer claimants' questions such as where is my transportation check, is this training approvable under TAA, etc.

IX. C. 4. e. Collaboration to Overcome Barriers

Many of the strategies, initiatives, and grants already described will address this challenge. Two specific examples are the special grant project to the Community Action Agencies to serve low skilled working adults, included in section V. G. The other effort that is underway is the Joyce Foundation RISE project that will focus on developing career pathways to move low skilled adults into higher skilled, higher wage occupations. This is a partnership primarily with the technical college system and will engage businesses on a sector-focused ongoing basis throughout the two year project.

IX. C. 4. f. Full Array of Services to Individuals with Disabilities

The basic structures for serving job seekers with disabilities are addressed through the local Job Center delivery system and through the partnership planning structures.

The Disability Program Navigators have been helping the Job Centers meet the challenge. Specifically, the Navigators are advocating at working/planning groups at the state and local level that affect people with disabilities. Navigators help determine and address staff training needs, and assist with employer education and outreach. The Navigator's role as important tools for services to the disabled transcends the walls of the job center. They are a community resource.

DWD will continue to provide the tools and strategies to strive towards universal access to core services under WIA. The Navigators will continue to be integral to addressing areas of need, such as language barriers, physical disability, geographic location, cognitive barriers, low reading levels and being economically disadvantaged. The state will encourage monitoring by local boards to ensure special need groups are receiving adequate services.

DWD will continue to support the Accessible Workstation project to provide universal access to the Job Center core services (e.g., JobNet, WORKnet, WisCareers). The 28 workstations deployed feature ergonomic furniture, screen reading, zoom text, voice recognition and other hardware solutions.

DWD has delivered training to Job Center (including partner) staff on communicating with deaf and hard of hearing customers, implemented TTY (text telephone) software in 30 Job Centers and continues to support and promote Jobline. In eight centers, video sign language interpreting is being piloted in resource rooms to increase capacity to serve deaf and hard of hearing customers.

The Navigators provide employer education that includes technology fairs, mental health toolkit, Medicaid Purchase plan, and disability specific resources. They also market bonding and tax credits that encourage employers to hire targeted groups.

IX. C. 4. g. Veteran's Services Staff Role in the One-Stop Delivery System

The major role of the Disabled Veterans' Outreach Program (DVOP) within the Job Center system is to provide intensive service delivery, through case management, to veterans with employment barriers, with special emphasis on targeted groups such as minorities, females, economically disadvantaged, disabled, homeless, and incarcerated individuals. The major role of the Local Veterans' Employer Representative (LVER) within the One-Stop delivery system is to provide business services to employers that will result in increased job opportunities for veterans through the job development process.

Both programs are measured by *entered employment* and *job retention* performance standards with the total veteran population and the disabled veteran population as the universe. Individual performance standards for LVERs and DVOPs include case management and staff-assisted placement of all veterans and disabled veterans, as well as job retention standards. In addition, individual performance standards for DVOPs include staff-assisted entered employment and retention for all veterans and disabled veterans; individual performance standards for LVERs include staff assisted entered employment and retention for all veterans and recently separated veterans.

The Job for Veterans Act [Public Law 107-288 issued November 7, 2002] which amended 38 U.S.C. Chapter 41 and 20 CFR 1001.120 states that all veterans must be provided "veteran's priority" for all DOL operated programs.

IX. C. 4. h. Limited English Proficiency (LEP)

Attachment L details the January 1, 2006, LEP Plan. LEP individuals are provided with access to Job Center services and all DOL federal financial assistance programs at no cost to the participant. Job Centers and WDBs are monitored for appropriate signage. Oral interpretation services are provided through a combination of bilingual staff, telephone interpreter services (a current contract with Certified Languages International) and a current vendor list for the translation of vital documents as required by *Executive Order* 13166 and the relevant DOL Policy Guidance including TEGL No. 26-02.

DWD has established #1826 *Translations Services Bulletin* which provides a current vendor list of foreign language interpreters for DWD and its partner agencies to access for procurement of services. The vendor list is developed via a bid process conducted by DWD.

Vital documents are inventoried as part of the LEP plan. The LEP plan identifies specific procedures and timeframes to assure that new vital documents are translated into required languages on a timely basis.

Element number two of DWD's *Equal Opportunity MOA* approved by DOL Civil Rights Center provides a further recitation on this component of the MOA. The MOA also includes a copy of the DWD's current LEP plan.

IX. C. 4. i. Activities Planned For Providing Services to Agricultural Employers and Migrant and Seasonal Farm Workers (MSFWs)

Staffing, Service Delivery, and Coverage

Wisconsin has in place a network of outreach workers based in Job Centers (WI's One-Stop system) statewide. There are eight to nine bilingual individuals providing services to both employers and workers however, each of these individuals has this responsibility as only a portion of his/her work. When viewed in aggregate across the state, these portions of eight or nine positions total less than 1.5 of a full-time equivalency. Thus, MSFW outreach staff are continually weaving in these duties throughout their other daily responsibilities. The only individual whose full-time work is to provide outreach services is a limited term employee based in Wautoma, one of the state's significant offices.

The hallmark of Wisconsin's current service delivery to both employers and MSFWs is in-person contact. Given the huge distances to some of the more remote camps (hundred mile-plus commutes for outreach workers), and the length of the season during which workers arrive (March through October), this remains an issue. Wisconsin continues to develop strategies that address issues of limited staff resources delivering services in the most efficient methods possible statewide, while recognizing an ever-growing need for these services.

Current program design:

- Wagner-Peyser funded outreach staff travel statewide to migrant camps and provide employment and resource information in person to workers and their employers.
- Staff work to time these visits close to the arrival of workers at the beginning of each season which covers a span of about March (nursery stock) through October (Christmas trees).
- Timing of these visits is pre-arranged with the employer to best fit the employers' and workers' schedules. In-person visits at both work and living sites are made.

- Coordination and collaboration with: a) outreach workers who have previously served the area, b) camp inspectors, and c) United Migrant Opportunity Services (UMOS) staff have provided beneficial information-sharing such as maps to locations, times to visit, etc.
- Packets of resource materials and a brief presentation about the contents, are provided to workers.
- Group presentations have been the most efficient delivery method with upwards of 100+ workers at some of these sessions.

As in the past few years, Job Service convenes 'pre-season' and 'post-season' meetings that pull together all outreach field staff as well as the State's Monitor Advocate and Job Service management staff. A very recent addition is the inclusion of camp inspectors in these meetings.

- The meetings allow all staff involved with implementing the program to prepare for the upcoming season, share promising practices, coordinate coverage and tackle difficult issues
- At season close, the same group is then able to discuss how the pre-season-developed strategies have worked, and what to work on during the 'between season' period (winter) in preparation for the next year's season.

Activities planned for service provision (program issues and strategies):

- As bi-lingual staff vacancies occur, local offices are faced with providing bi-lingual services without that staff member present. Job Service has obtained a listing of authorized interpreters (for a number of languages), and distributes this listing to all Job Centers statewide (not just offices with MSFW activity).
- At the post-season meeting, discussion is not only of the season just completed but also service delivery improvements and training opportunities for staff. As follow-up from the 2004 MSFW Roundtable in Chicago, training has been provided related to human smuggling and trafficking.
- On a much broader basis – and related to program integration and service delivery system-wide – the Job Service Operations Plan has Resource Room diversity as one of its thrusts. This will benefit a wide variety of customers beyond, though including, MSFWs.

Vehicles such as email, Internet, and other computer strategies are being used to meet the needs of a widely dispersed and mobile population (employers and workers alike). Wisconsin will continue to discuss and consider technology-based solutions to augment and better deliver services.

IX. C. 5. Priority of Service

IX. C. 5. a. Procedures and Criteria

All WDBs have local priority of service policies in place related to public assistance and other low income individuals based on the state policy that was revised in response to the Veteran's priority of service mandate. Veteran's priority of service mandate was further clarified as delineated in C.5.b. In addition, DWD is providing further clarification to the WDBs through the WIA Local Plan review and approval process.

IX. C. 5. b. Provision of Priority of Service to Veterans

Wisconsin issued *State Veteran Program Letter* 01-05 on April 13, 2005, that outlines the Veteran first-served requirements for all DOL programs. (Attachment M). LVERs, as program lead workers, will develop annual Community Based Organization (CBO) plans regarding the local office adoptions of these policies and strategies to ensure collaboration and compliance. During PY2006, the LVER/DVOP program will issue a policy letter outlining minimum performance expectations in the local service delivery areas of all DOL programs.

DWD has highlighted the importance of serving veterans by attaching the DWD State Veterans Coordinator directly to the Secretary's Office. This action reaffirms our commitment to providing the needed employment and training services to Wisconsin's veterans.

IX. D. Rapid Response

The Dislocated Worker Section is the organizational unit responsible for conducting rapid response activities. The section has two full time Rapid Response Coordinators. Other staff in the section are trained to provide backup to the Rapid Response Coordinators as needed.

Activities are coordinated with WDBs and local elected officials through designated staff contacts in each WDA. In events that have more than 50 people affected, the state rapid response staff are responsible for making initial contact, scheduling the initial meeting with the company and where appropriate, local unions. Local WDB staff are included in initial meetings so that they can present local information on services and how to access them.

A variety of sources are used to identify events. These include, but are not limited, contact with the following sources:

- AFL-CIO Labor Education and Training Center state level and field staff;
- Electronic and print media;
- WARN and State Plant Closing/Mass layoff notices;
- State and local Economic Development Agencies;
- Outplacement consulting firms;
- WDB staff and providers;
- UI Profiling and Reemployment services staff;
- Elected legislative officials;
- State and local level business associations; and
- Local Job Center contacts.

During the initial visit with employers, Rapid Response Coordinators emphasize the benefits of early intervention. The goal of every initial visit is to walk away having set up the dates and times for worker orientations. The Rapid Response Coordinators explain to the company the benefits of conducting the worker orientations early, on-site and on company time.

Rapid Response services are informational. Worker orientations are conducted by state and local service provider staff. Local service provider staff are the primary presenters on services available in their area. They present the information to the workers thereby establishing a local contact at the worker orientation. At the orientations, workers are surveyed to determine the interest and need for specific workshops, training and other activities. Trade Act petitions are filed at the initial meeting or shortly thereafter. They are not covered in the initial Rapid Response meeting with the workers. Should a company become TAA certified, a separate TAA/TRA session is conducted for the workers.

State Rapid Response staff meet with state economic development staff in the Commerce to discuss mutual contacts and services. They exchange data with business development staff on each plant-closing event. On occasions where Commerce is working with a client and it is determined that dislocated worker services are needed, Commerce staff refer the client to the Dislocated Worker Section. Information gathered by the Dislocated Workers Section through workforce surveys is shared with Commerce staff in an effort to identify the skills of a particular workforce that may be of interest to a new business considering placing a facility in an area where a plant closing or layoff has recently occurred.

Rapid Response staff are aware of the services provided by the Commerce and local economic development agencies. When conducting an initial Rapid Response meeting, state staff always ask the company if they have been in contact with the Commerce to see if something can be done to save the business.

If not, and the company is interested, staff refer the company to the Local Economic Development Manager. Representatives of the state Manufacturers and Commerce Association and Commerce sit on the Dislocated Worker Subcommittee of the state CWI. These agencies promote Rapid Response as a business-friendly activity.

The state Rapid Response Coordinators work with outplacement consulting firms to leverage private resources whenever they are involved in any event. Services are planned to be complementary and non-duplicative. The Dislocated Workers Section coordinates with other agencies including Employee Benefits Security Administration, Veterans' service agencies and the Social Security Administration.

The state uses an Access database to track rapid plant closing notice activity and Trade Act Petition Data. Since Rapid Response services are informational, participants are not tracked. All WIA, including NEG, TAA and Job Center services are tracked in the ASSET information system.

Approximately 80% of the Rapid Response funds available are used to provide additional assistance to local areas experiencing increased unemployment because of dislocation events that require funds beyond the formula amount.

IX. E. Youth

IX. E. 1. Strategies, Requirements and Coordination

Strategies for providing comprehensive, integrated services to WIA youth.

Wisconsin has a comprehensive WIA youth program currently in place. Governor Doyle has communicated his commitment to quality programs for youth through the *KidsFirst* Initiative and his *GROW Wisconsin* Initiative. Through completing the DWD Local Plan Guidelines, WDBs updated their local plans pertaining to the provision of WIA Youth services including implementing DOL's new strategic vision for youth and how they will integrate those services into the Job Centers.

During Program Years 2007 and 2008, as DWD works with its state and local partners to implement DOL's new strategic vision for youth, we will use the following strategies to continuously improve our WIA Youth program and to engage youth most in need.

Overall Strategies

- Coordination with other state agencies including the DOC, DHFS and DPI, WTCS Board regarding the provision of comprehensive youth services;
- Improvement of linkages to the job market, employers, non-profit and faith-based organizations, social service agencies, and youth service providers;
- Focus on meeting the demands of business, especially high-growth/high demand industries and occupations; and
- Provision of additional technical assistance and training to WDBs and youth service providers which would include training on the assessment process, case management systems, and improving performance.

Service Strategies

- Strengthening the connections with the DPI, WTCS Board and the University of Wisconsin System to increase public awareness of the importance of education;
- Providing technical assistance and training related to helping youth find gainful employment (full-time or part-time), and the necessary support services needed to help them obtain or maintain employment, such as childcare, transportation, assistance with uniforms or other work attire, eye glasses, linkages to community services, and assistance with housing;
- Helping youth understand that securing employment opportunities and increasing one's career potential is directly related to completing education and/or skills training, and attainment of education/employment credentials;
- Financial literacy training and credit counseling, if needed;
- Provide career development training, which includes labor market information for K-12 school teachers and local WIA youth staff and youth service providers; and
- Working with WDBs to ensure that the education and skills training needed by youth to attain education/employment credentials, participate in post-secondary education, or become gainfully employed in a career with advancement opportunities is available to them.

DWD will ensure that the most at-risk and neediest youth receive appropriate services through the following strategies and activities:

Partnering strategies to strengthen education and training of older and younger youth

The CWI State Interagency Team which includes representatives from DWD, DHFS, DOC, Commerce, DPI, Veterans Affairs, and the WTCS will provide a forum for strategizing how to coordinate educating and training Wisconsin's future workforce. This will include addressing the education needs and engagement of out-of-school youth.

Another effort under way that could strengthen the education and training of older and younger youth is Wisconsin's NGA Service Integration Project, now called Families Forward. Wisconsin initiated and supported six pilot projects to improve coordination between W-2 and Child Welfare so families that are involved in or at-risk of involvement in both systems have access to more streamlined services leading to improved outcomes for the family. Demonstration sites supported in Bayfield, Dane, Kenosha, LaCrosse and Milwaukee counties were successful in improving service delivery for families and more proactive outreach and involvement of workforce services. The state, led by a core team comprised of the Governor's Office, Secretaries of DWD and DHFS, the Superintendent of Public Instruction and leaders from philanthropy, advocacy and not-for-profit agencies, and a representative of the South Central Wisconsin WDB advised the projects about how to strengthen these connections and improve service delivery. The demonstration projects worked with families to better tie together health, mental health, AODA, job training and WIA partners. The Institute for Research on Poverty conducted a progress report and management assessment of continued steps that can be taken to build on the system coordination efforts in each of the projects and at the state level. Continuing to reinforce the tie to economic sufficiency through connection to employment services will be critical as efforts move forward.

The WSTI workgroup led by DPI and including membership from DWD will work at the grass-roots level to ensure ongoing collaboration and communication regarding services to youth as they move from school to the work world. WSTI members include:

- DPI;
- Cooperative Educational Service Agencies;
- Wisconsin Family Assistance Center for Education, Training and Support;
- Technical College System Board;
- University of Wisconsin Madison Center for Education and Work;
- DHFS;
- DOC/Division of Juvenile Justice;
- Wisconsin Statewide Parent-Education Organization; and
- Public school (K-12) representative.

Out-of-School Youth

Serving out-of-school youth is one of the most crucial issues facing Wisconsin. Out-of-school youth have problems connecting to the labor market. The major challenge in serving this population is not in identifying them, but recruiting, retaining and keeping them engaged in the program. Most out-of-school programs are not designed to meet

the needs of older youth. These programs do not offer age-appropriate or other activities that interest youth. DWD and WDBs will focus on strategies to provide for necessary employment, as well as addressing need for basic skills, occupational skills, and work readiness skills.

Strategies to Recruit Out-of-School Youth

- Marketing youth-focused outreach materials;
- Developing youth-based informational websites; and
- Presentations by Job Center staff to youth and their families in traditional and non-traditional places, such as convenience stores, laundromats, and youth centers.

Strategies to Target Services to Out-of-School Youth

- Focusing on strategies to retain those out-of-school youth engaged in required education/skills training activities;
- Improving accessibility to Job Centers services for out-of-school youth through:
 - Consideration of establishing convenient and extended hours for youth;
 - Conducting out-of-school youth forums and focus groups;
 - Presentations by Job Center staff in places frequented by out-of-school youth; and
 - Providing separate youth oriented areas in the Job Centers to include information regarding youth services and youth-specific materials.

Strategies to Retain Out-of-School Youth

- Recruiting employers to serve as guest speakers at events/activities, providing youth with information about their companies, their industry, expectations, and hiring practices; and
- Asking employers to assist with mock interviews.

Court Involved Youth

DWD staff participate in an interagency work group created by the DOC focused on court involved youth. The work group includes members from the DPI, DWD and DHFS, and the WTCS Board. The purpose of the workgroup is to help provide information, resources, and training, to enhance the education of youth while they are incarcerated and when they transition back to their community.

Foster Care

DWD received a \$1 million DOL grant to implement the FFCYG program to help youth who have aged out of the foster care system. Participants in the program receive a \$500 a month stipend to help with living expenses (rent, utilities, food, and personal care expenses), case management, career education, and assistance with employment search. As noted earlier in the Plan, this project ends June 30, 2007.

Statewide Transition Initiative for Youth with Disabilities

As outlined in section V.H., the mission of the Wisconsin Statewide Transition Initiative for Youth with Disabilities is to improve the educational outcomes for students with disabilities. A workgroup led and funded by the DPI and which includes a DWD staff person works to implement this initiative. Other partners include:

- WI Regional Service Network;
- WI Statewide Parent Educator Initiative;
- Wisconsin Assistive Technology Initiative;

- WI Technical College System Board;
- WI DOC;
- University of Wisconsin System;
- National Alliance for Secondary Education and Transition;
- WI DHFS;
- WI Family Assistance Center for Education, Training and Support;
- Waisman Center (UW-Madison);
- National Secondary Transition Technical Assistance Center;
- IDEA Partnership; and
- Independent Learning Centers.

Homeless Youth

Ongoing communication and collaboration with our partners that work with homeless youth through the SIT and the WSTI will ensure that these providers are aware of available programs and services at Job Centers and refer homeless youth to these services.

Migrant and Seasonal Farm Worker Youth

DWD will collaborate with local school districts, local head start programs, local non-profit organizations (including faith-based) and employers that provide services and programs to migrant and seasonal farm worker youth.

Refugee Youth

Currently the Bureau of Migrant, Refugee and Labor Services has an initiative called Road to Work. The purpose of Road to Work is to help refugee women and out of school youth (18-25 years) obtain English, skill training and jobs. DWD will collaborate with county and local agencies, voluntary agencies and refugee services providers to assist in connecting to local Job Centers that can provide various services to refugees.

IX. E. 2. Job Corps

Currently, Wisconsin has one Job Corps Center – Blackwell Job Corp Center located in Laona. Milwaukee will open a Job Corps facility in October of 2008.

Blackwell Job Corps Center Provides Education and Training including:

- High School Equivalency Diploma;
- Work-Based Learning Opportunities;
- Personalized Career Development; and

Hands on Training in: Bricklaying, Carpentry, Business Technologies, Electrical Work, Facility Maintenance, Painting, and Welding.

A number of state entities coordinate with various youth programs including the following examples:

The DWD administers the State's Youth Apprenticeship Program and the WCTS administers the Tech Prep Program. Working collaboratively, DWD, WCTS and DPI have formed partnerships to connect the classroom to the community and employers. As a result of the partnerships, students in Wisconsin's 426 school districts have access to school-to-work opportunities. The programs are coordinated locally by school-to-work, youth apprenticeship, tech prep, and vocational educational

coordinators located in elementary, middle and high schools, technical colleges, the UW, Cooperative Service Agencies, chambers of commerce and other community organizations.

DPI administers the Wisconsin Skill Standards Certification programs, and partners with businesses, K-12 School Districts, Technical Colleges, DWD and unions. DPI sponsors the following programs that are essential tools for training and employment assessments:

- Wisconsin Cooperative Education Skill Standards Certificate Program
- Wisconsin Employability Skills Certificate Program
- Assistant Child Care Teachers Program

The University of Wisconsin-Extension programs in 4-H Youth Development give young people opportunities to learn new skills, gain self-confidence, and contribute to their communities. UW-Extension partners with the UW four-year campuses, Wisconsin counties, tribal governments, non-profit organizations and other organizations in their local communities to help youth grow and learn.

IX. E. 3. Reserve Funds for Statewide activities

IX. E. 3. a. Utilizing Funds to Promote Coordination

IX. E. 3. b. Cross-cutting Models

IX. E. 3. c. New Models for Alternative Education

IX. E. 3. d. Demand-Driven Models

DWD has identified high wage employers in each WDA. Business Service Teams are establishing special relationships with these employers to discern how Job Centers may provide services to them.

IX. E. 3. e. Program Design

(The following response is related to all topics, a. through e.)

Wisconsin continues to use very limited reserve funds for youth programming. It is the state's intent to continue some level of support for **Project Lead the Way (PLTW)** described earlier. PLTW is a pre-engineering program for middle schools and high schools, designed to interest students in careers in engineering and to begin preparing them to be successful in advanced engineering education. Our previous approach was to partner with the DPI as part of their incentive grant funded by Carl Perkins 10% funds. Since funding from Perkins is still on hold we are unsure of how DWD will use the \$50,000 we have allocated for this but will be planning with our workforce boards to have something in place for the fall 2007 school year.

Other efforts in cross-cutting models and alternative education include:

- The **Dane County Transition School (DCTS)** is an innovative charter school that serves 60 at-risk students, 14 – 21 years for age. DCTS is designed around specific program objectives that re-engage at-risk students into the learning process and help students realize that

education is practical and functional to everyday living. DWD's WIA Youth Program staff person has provided technical assistance and training on career development, case management, assessment tools, and labor market information.

- **Generac Power Systems, Inc. Youth Apprenticeship Program – A Second Chance** designs and manufactures top quality, long life power generation equipment. They are one of the leading companies in this dynamic business. Many years ago the Generac Company realized there was a shortage of young people choosing manufacturing as a career. They also knew that the traditional high school experience was not for everyone. As a result, they partnered with DWD, University of Wisconsin Whitewater, and several local school districts to integrate the Manufacturing Production Technician Youth Apprenticeship Program into their business. As part of this year-round competency-based program, at-risk students work in various departments throughout the company, as well as on a variety of production lines. This “hands on” experience is combined with interactive classroom on-site time to help the students learn important concepts in engineering, math, science, English, and social studies as well as earn credits toward high school graduation.

The apprentices are paid an hourly wage, expected to report to work like other employees, and have their pay reduced for tardiness, unacceptable work, or any other similar infraction. A certified teacher works with the students in Generac's on-site Training Center and coordinates this twenty-month program with the local high school. With individual instruction and numerous mentors, participants make valuable connections to help them learn and succeed. Students who complete the program are awarded a state Youth Apprenticeship certificate and receive a high school diploma from their local high school.

DWD's WIA youth program staff member provides technical assistance and training in labor market information, career portfolios, health and safety in the workplace, post-secondary options, and motivation in the workplace.

Generac has recruited a number of other businesses in southeast Wisconsin to replicate this program model, resulting in many more at risk students completing high school and acquiring valuable job skills.

- At the 2004 Youth Regional Forum, DWD, DPI, DOC/Office of Juvenile Corrections, and the WTCS developed a plan incorporating DOL's new Youth Vision. The plan focused on helping juvenile offenders transition to the world of work, postsecondary education and back to their communities. Each participating agency has provided information, materials, resources, contacts and training for Juvenile Corrections staff that will better prepare young offenders as they transition out of the youth facilities. Activities that have been completed by DWD and the other partnering agencies to implement the plan include:

- Training and materials on how to administer and interpret assessments;
- Training and materials on Career Education;
- Training and materials on health and safety in the workplace for teens;
- Training and materials on Financial Literacy;
- Provision of materials and information on how to help young offenders with disabilities;
- Connecting juvenile corrections staff and young offenders to Job Centers;
- Connecting juvenile corrections staff and young offenders to Navigators located in the WDAs;
- Connecting juvenile corrections staff and young offenders to state apprenticeship programs; and
- Connecting juvenile corrections staff and young offenders to employers.
- There is a state policy on "design framework" that specifies the requirements. DWD LPLs monitor each WDA to ensure they are in compliance with WIA Federal Law. Each WDA must provide documentation they have administered an objective assessment of the academic levels, and service needs of youth, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes (including interests and aptitudes for nontraditional jobs) supportive service needs and developmental needs of each youth. The local area must also develop an Individual Service Strategy for each participant that identifies an employment goal (including, inappropriate circumstances, nontraditional employment); appropriate achievement objectives, and appropriate services for the participant taking into account the objective assessment results.

IX. F. Business Services

IX. F. 1. Determination of Employer Needs

DWD conducted an extensive assessment of employer needs in a series of locally based focus groups. The focus group generated extremely useful information because it relates to workforce issues in general and Job Center system service expectations specifically. Moreover, the cooperative effort between WDB staff and Job Service was a productive approach that offered the added bonus of strengthening the partnerships needed for improved business relations.

The Wisconsin Job Service's Operations Plan is structured to ensure that Job Service staff in the public labor exchange and affiliated programs are working intensively with the business community to determine and respond to a variety of business needs. These include, but are not limited to, recruitment and retention objectives of current and new employer customers. The Job Service plan emphasizes accomplishing these goals within the context of the Job Service system partnerships that have long existed throughout Wisconsin, with Job Service's involvement as a longtime collocated core partner.

IX. F. 2. Integration of Business Services and Wagner-Peyser

Wisconsin has made improvements in the seamless service delivery offered in our system of local Job Centers. As a result of that joint enterprise between Job Service and local WDB staff, Job Service has begun to prioritize work with our business customers, especially those in high growth and high wage industries. Job Service staff have developed and maintain expert knowledge about the job economy and today's workplace requirements, especially in *Grow Wisconsin* occupational areas.

To help implement a more talent development-driven workforce system, DWD and the WDBs will continue to work together on regional issues which may, in some instances, cross the 11 WDBs' existing boundaries.

As new partnerships with business and industry are formed, the workforce system will devise additional development strategies that facilitate the adoption of common workforce, educational, and economic goals. By continuing efforts to identify the high-growth job areas within Wisconsin we will be responding effectively to the business and industry needs for a skilled workforce and will be successful in meeting the demands.

DWD has required Job Centers to establish a tiered approach to providing business services and to implement a fee-for-service schedule. Tiered service stipulates that Job Centers provide more intensive service to businesses that have jobs that are high-wage and in high demand. Fees for services are also tiered. Businesses with higher-quality jobs may be charged less for service than businesses with lower-wage jobs. Examples of services that a business may be charged for include: applicant screening and matching, job analysis, special employer-required job seeker assessments, specialized Job Fairs, facilities use for recruiting, unemployment and equal rights coaching, business expos, and other non-core services. No business will be charged for core services.

IX. F. 3. Streamlining Federal Tax Credit Programs

BWP administers the Work Opportunity Tax Credit Program (WOTC). WOTC is a federal tax credit offered to employers as an incentive to hire people who face significant barriers to employment. BWP staff issue the final certification to the employer via an automated system.

WOTC tax credit program information is available in 48 Wisconsin Job Centers. Staff within the Job Centers assist in streamlining the tax credit process by acting as information brokers to market the availability of the tax credit program. Linkages and cooperative agreements with county departments of social services, the Wisconsin DOC, and private employment agencies create partnerships that may issue conditional certifications to their eligible client populations.

Employer involvement and participation in the WOTC program involves staff working directly with businesses, job applicants, and employment consultants, then processing the submitted documents, and issuing "conditional certifications" for the employers to claim the applicable target group tax credit. The WOTC tax credit benefits both employees and employers -- those employees who typically experience difficulty in obtaining employment and employers seeking qualified candidates to fill job openings.

IX. G. Innovative Service Delivery Strategies

IX. G. 1. Improvement Efforts

Wisconsin has implemented the following innovative service delivery strategies to maximize resources, increase service levels, improve service quality, achieve better integration or meet other key state goals:

- Made the TANF Program a mandatory WIA partner;
- Required that the TANF-funded W-2 programs to the extent possible be located in Wisconsin's Job Centers;
- Required that the W-2 plans for the 2006-2009 contract period receive review by the local WDBs;
- Held a Job Development Symposium to address the business needs workers whether WIA or TANF eligible;
- *Baldrige Express* – DWD is promoting the use of the Baldrige Express by the WDBs for self-assessment purposes. The Baldrige Express provides an objective assessment that can help a WDB better understand how it is doing in fulfilling its leadership responsibilities and how it can better align all aspects of its organization toward achievement of its key goals;
- *Job Center Service Standards*;
- Wisconsin Employment Transportation Assistance Program – DWD and DOT have implemented a joint grant program to assist low income workers with their work-related transportation needs;
- Disability Navigator – Wisconsin is administering a grant program which funds Navigators in the 11 WDAs; the purpose is to provide increased access and advocacy for disabled individuals to use the One-Stop system; and
- Credentialing – Wisconsin has implemented a credentialing program for WIA Job Center staff.

IX. G. 2. PRA

Wisconsin is not participating in the US Employment and Training Administration (ETA) Personal Re-employment Account demonstration at this time.

IX. H. Faith-Based and Community Organizations

Faith-based and community organizations (FBCOs) have been essential in outreach to their constituencies for the workforce system particularly with specialized support. The connections with and utilizations of FBCOs starts at the top of state government. Governor Doyle has a director of faith-based initiatives, Julietta Henry, who serves as his liaison for faith and community-based activities. An example of how these organizations are actively involved in specific employment and training activities, Wisconsin Community Action Program Association (WISCAP) has played a vital role in outreach for the workforce system. As a voluntary association of the state's 16 Community Action Agencies and three special purpose agencies, the Governor saw the opportunity to build on his *Grow* Initiatives with the Skills Enhancement Program utilizing this state-wide community network. In addition to general purpose revenue support, WISCAP was the recipient of WIA state set-aside funds to implement this program (addressed in V.G.) This is a high impact initiative that has already demonstrated success in expanding economic opportunity for the working poor by building job skills to obtain living wage employment with health insurance.

The state also reinforces the value of FBCOs as training providers to maximize consumer choice. For example, there are a large number of private, faith-based post-secondary and health care institutions that offer programs approved for the state's ITA list including Marquette, St. Norbert, Viterbo, Cardinal Stritch, Concordia, Carthage, Maranatha Baptist, Wisconsin Lutheran and, out-of-state providers such as the University of St. Francis, Olivet Nazarene, Loyola, St. Scholastics, St. Mary's, St. Thomas, Trinity College and Trinity University as well as health care facilities St. Joseph (Marshfield), St. Joseph Residence (New London), St. Michael (Milwaukee), St. Luke's (Milwaukee), and Holy Family Memorial Health (Manitowoc).

For the WIA Local Plans, DWD specifically requested the WDBs provide examples of "strategies for Faith-based and Community Organizations" to increase the opportunities for their participation "as committed and active partners in the One-Stop delivery system." Examples at the local level within the WIA infrastructure include:

- Ensuring FBCOs are included in all competitive RFPs and as subcontractors for special grant initiatives
- Referring a client to FBCOs when appropriate as part of their employment plan
- Inviting FBCOs to hold itinerate services at the job centers
- Creating out-stations at local faith centers to serve as computer resource areas
- Participating to serve on the local job center coordination teams
- Coordinating services specifically for special needs populations and recent immigrant members of a community
- Sharing resources for joint public service announcements and extensive network referrals.

A specific example of a successful collaboration project occurred in the North Central Wisconsin Workforce Development Area. The WDB facilitated a group of 43 service providers, primarily FBCOs, to identify the needs and strategize how to address the gaps in services for the emerging Latino population in central Wisconsin. Leadership from the group wrote and received a grant that now provides four bi-lingual navigators in an outreach effort to serve the emerging Latino community. The WDB staff and the Chair of the One Stop Consortium are active members in this initiative. From this group, relationships have developed that will undoubtedly lead to further partnerships and integration into the job center system.

Finally, the inclusion of faith-based organizations in the Wisconsin Works (W-2) program was encouraged because of the advantages that these agencies offered in the successful administration of the W-2 program. Historically, the faith-based organizations have always been involved not only in the spiritual growth and strengthening of their communities but also in providing critical services such as health care, counseling, shelter, etc.

The W-2 program effectively employed faith-based organizations through subcontracts in order to provide critical components of services to W-2 participants. Some of the areas for which the W-2 program used the faith-based organizations include the following:

- Case management services
- Life-skills training
- Parenting skills
- Job development
- Supported employment
- Drop-in child care centers
- Money management

- Time management
- Drug screening and counseling
- Conflict management
- Management skills.

The participation of faith-based organizations in W-2 has since declined from its peak at the beginning phase of the W-2 program where W-2 agencies were required to subcontract with them as part of the performance standards that DWD established for W-2 agencies to meet. However, because of limited state funding to the W-2 program that requirement has been removed.

DWD's Equal Opportunity Specialist, William Franks, is the contact person for ensuring that state policies and guidelines are updated to comply with the Federal Equal Treatment Regulations.

X. State Administration:

X. A. Technology Infrastructure and Management Information System

DWD provides a wide variety of IT support to Wisconsin Job Centers:

- ASSET: an automated case management system for tracking a customer's services and outcomes;
- JNB to track services to business;
- CMDR: enables case managers to identify individual customer participation in a variety of related programs;
- Statewide List of Eligible Training Programs: Access to programs approved for use by persons holding ITA vouchers. <http://www.wisconsinjobcenter.org/ita>
- WORKnet: enables individual customers to access labor market and occupational information, business access to information about the labor market and economy and researchers to access labor market information and historical data;
- JobNet: allows business customers to post job openings statewide (and through the link to America's Job Bank, nationwide) and allows individual customers access to posted jobs;
- Data Warehouses for Job Centers to get reports about program participation and performance;
- The state eligible training provider list: allows individual customers and case managers to make informed choices about potential training providers;
- Accessible Workstations: These disability adaptive computer workstations enable persons with disabilities to access the above products more easily;
- wisconsinjobcenter.org: This website is a link site to a wide variety of workforce development tools for individual and business customers as well as Job Center staff; and
- The data lines to comprehensive Job Centers.

DWD will prohibit the use of local WIA funds for the development or maintenance of any local participant or employer tracking or job listing system since one is already provided by DWD.

X. B. Reserve Funds for Statewide Activities

The Governor's reserve (discretionary/set-aside) funds will be used both to support national directions as listed in sections V. G. and VII. D. and also to support administrative efforts DWD as follows.

- **Support for the Office of Economic Initiatives and CWI Staffing** – Reserve funds are used to support the Office of Economic Initiatives that includes the CWI Coordinator and staff working on state and national strategic directions in regional partnerships and sector-based strategies.

- **Performance incentives, technical assistance and continuous improvement activities –**
 - **Performance incentives and technical assistance and training** to recognize and reward WDB exceptional performance in delivery of WIA programs, to address WDB performance deficiencies where they exist, and to advance the knowledge and skills of leaders and staff responsible for planning and delivering WIA services and managing/operating in Wisconsin's Job Center system. (\$300,000)
 - The **Wisconsin Forward Award, the state level Malcolm Baldrige** award program to promote and provide learning opportunities about performance excellence management and to provide a tool for consistent assessment, benchmarking, and measurement of organizational effectiveness. The CWI and DWD play a strong role, serving on the board and providing financial support. Through this support, we can help advance the competitive position of Wisconsin businesses, the effectiveness and efficiency of public agencies, and the continuous improvement of the workforce investment system. (\$100,000)

X. C. Waivers and Workflex Authority

Wisconsin has one waiver for WIA Title I. It postpones the enactment of the subsequent eligibility process. This has allowed the state time to enhance the state list. This includes improving the process for populating it, building a database with WIA performance information on training programs and providers, making its information easier to use, and making it more accessible. As noted earlier, the state is requesting an extension on this subsequent eligibility waiver.

X. D. Performance Management and Accountability

X. D. 1. Performance Accountability System

ASSET is an internet-accessible participant reporting and data collection system that all case managers and WDBs use to report WIA Title 1 and partner services for both performance measure and WIA Standardized Record Data reporting. ASSET is the official data source for all performance and program management data. The state has directed considerable funds and resources in this system's development to ensure that performance measure calculations are consistent with current Federal reporting requirements as specified in US DOL TEGL 17-05 Common Measures Policy for the Employment and Training Administration's Performance Accountability System and Related Performance Issues.

Attachment N shows the PY07-08 performance measure goals that Wisconsin and the U.S. DOL agreed to on June 27, 2007. Negotiations with our local boards will begin on July 1, 2007 and will be concluded by mid-August 2007. Local boards must negotiate performance goals for the 17 currently mandated WIA Title 1 performance measures for Adults, Dislocated Workers, Older Youth, Younger Youth and Customer Satisfaction. No additional performance goals are set for local boards.

Staff have developed a number of tools to assist State and local staff in monitoring performance throughout each program year. These tools include:

- Technical Assistance Guides for each group of performance measures for Adult, Dislocated Workers, Older and Younger Youth, and Trade Adjustment Assistance have been developed to help local boards understand and navigate the performance measurement system. These guides explain how each measure

works, how data must be reported in ASSET, how and when supplemental employment data is brought into performance measures, and provide an example of how each measure is computed using a sample set of data.

- A "Performance Measure Map" details the performance measurement system as it relates to ASSET. Each of the 15 participant-related performance measures is broken down into its individual components. The guide describes which components are factors in the numerator and denominator, and describes exactly where in ASSET this data is drawn from.
- A WIA policy update system is used to communicate State interpretation of Federal policies where states are given discretion and flexibility. Any published policy that affects performance includes a section designed specifically to describe how data is to be entered to ensure that performance is reported properly.
- Performance measures are a regular component of our technical assistance and training activities throughout the year. In addition to specific performance measure training conferences held each summer, staff participate in roundtables and provide locally customized training upon request.

Local staff are provided with quarterly performance reports and data that help them to monitor and continuously improve their participant reporting and performance outcomes. In addition to locally customized reports that coincide with the U.S. DOL's quarterly performance reporting formats, DET staff compute program-year-to-date performance outcomes so that local boards can monitor their progress toward meeting their negotiated performance goals.

DET staff have developed a "Performance Achievement Report" that is updated each year following submission of the WIA Annual Report. The report will eventually contain the most recent seven program years of performance outcome data broken down by WDA. The report shows performance outcomes by participant characteristics, targeted populations, and other views. Because the reports are produced based on program year (i.e., July 1 - June 30), instead of "performance measure year" dates (which vary according to the measure), the data provide local boards with another perspective on how program participants fare in their programs. These data are used by local boards to apply for grants and to develop programs designed to address and improve service delivery, program design and participant outcomes.

Despite continuing software development and publishing issues, the Data Validation effort that U.S. DOL launched three years ago has been a useful resource for helping Wisconsin to fine-tune its reporting processes and program policies. Staff have recently completed a number of changes to ASSET that are resulting in far fewer rejected records which will improve the overall quality of our annual report validation.

All of these tools and training activities have contributed to the continuous improvement of our performance outcomes over the past several years. The volume of local inquiries about performance measures has declined significantly, because local staff have these resources available to them. As a result, State staff are now able to review and evaluate participant data and performance in a "real time" context by examining active participant records to address reporting and service delivery issues before participants exit the program.

Our goal for PY07-08 is to develop performance "prevention" strategies that emphasize quality data and efficient use of ASSET and case manager time and resources to further improve performance outcomes that are sensitive to data entry and reporting errors. This effort will begin with a Data Quality Summit scheduled for late summer 2007. The conference will feature representatives from the U.S. DOL National and Regional Offices and the Social Policy Research Associates (SPRA). In addition, DET staff are beginning to more closely examine the newer youth measures that are included in U.S. DOL's Common Measures policy in preparation for negotiating goals in future years.

The recent transference of the Wage Record Interchange System administrative function to US DOL in late 2006 has disrupted the flow of out-of-state wage data that Wisconsin needs to fully determine performance outcomes. Staff are closely monitoring the impact of this transition on Wisconsin's performance outcomes. While year-to-date PY2006 performance does not appear to be severely affected at the state level, a few local boards have seen some detrimental impact on performance outcomes because we do not have access to all states' UI wage record data. Since a number of states have expressed reluctance in entering into data sharing agreements with the US DOL until changes are made to the agreement's content, Wisconsin may need to offer an opportunity to some local boards to revise their PY2006 performance goals. If state level performance is significantly affected by the absence of data, we may have to request revisions to the State's PY06 performance goals as well.

Wisconsin implemented US DOL's common measures policy in PY2005. The outcomes we have seen thus far are encouraging, with the exception of the Youth Literacy and Numeracy Gains measure, for which there isn't much data available as yet. We believe we'll see a more representative sample of participants and their outcomes at the conclusion of PY2006.

Shortly before negotiations with the U.S. DOL commenced on June 8, 2007, we received further information from the Regional Office regarding their expectations for goal setting and negotiating. We reviewed DOL's counter proposals and made a few adjustments based on our participant and economic data. We have reached agreement on 16 of the 17 performance goals for PY07-08. The agreed upon goals address DOL's questions regarding continuously improving performance. Staff are gathering the necessary data to support the state's position regarding the Adult Average Earnings measure, which is the only goal still under discussion. The current status of these negotiations are reflected in Revised Attachment N on page 8. As you can see on the attached chart, based on the formal negotiations with the Regional Administrator, the performance levels demonstrate the goal for continuous improvement given the current economic environment. Once agreement has been met on all of the measures, we will further expound on continuous improvement of performance for this section, update X.D.8., and provide the final Attachment N.

X. D. 2. Targeted Groups

Wisconsin tracks specific targeted applicant groups required by DOL as part of its annual report requirements. As part of our continuous improvement strategies, staff continue to examine participant post-exit employment data for PY2003-04, the two most recent program years for which complete UI wage record data is available. Employment retention continues to present challenges in the Adult and Dislocated Worker programs as a result of the change in the performance measure's definition of

retention which now requires participants to be continuously employed in the first, second and third quarters after exit. The tables that follow illustrate this problem quite clearly.

Employment Retention in PY03-04

Program Year 2003					Program Year 2004				
Adults					Adults				
Gender	Exited	Employed in Q1 After Exit	Retained in Q2 After Exit	Retained in Q3 after Exit	Gender	Exited	Employed in Q1 After Exit	Retained in Q2 After Exit	Retained in Q3 after Exit
Male	1068	801	692	625	Male	962	716	627	563
Female	1898	1413	1278	1192	Female	1758	1417	1307	1190
Total	2966	2214	1970	1817	Total	2720	2133	1934	1753
Dislocated Workers					Dislocated Workers				
Gender	Exited	Employed in Q1 After Exit	Retained in Q2 After Exit	Retained in Q3 after Exit	Gender	Exited	Employed in Q1 After Exit	Retained in Q2 After Exit	Retained in Q3 after Exit
Male	2354	2008	1904	1851	Male	2299	1970	1890	1792
Female	2293	2005	1923	1868	Female	2379	2062	1990	1900
Total	4647	4013	3827	3719	Total	4678	4032	3880	3692

Nearly 75% of adult males and 85% of adult females are successful in retaining employment for all three post-exit quarters. Dislocated workers fare somewhat better with approximately 90% of exited participants retaining employment in all three post-exit quarters.

In our previous State Plan, we noted that the WIA Title 1 Adult program served nearly twice as many women as men from PY2001-03. This trend has not changed in PY2004-05.

Adults Served by Gender PY2003 - PY05					
PY2003		PY2004		PY2005	
Adults		Adults		Adults	
Gender	Exited	Gender	Exited	Gender	Exited
Male	1068	Male	962	Male	801
Female	1898	Female	1758	Female	1884

From PY01 - PY03 women earned about 18% less than men did by the third quarter after exit. This wage gap narrowed slightly between PY2003 and PY2004 from 17% to 16% but more needs to be done to help women improve their earnings potential through high wage occupations.

Comparison of Six Month Average Earnings by Gender			
PY2003		PY2004	
Male	Female	Male	Female
\$10,366	\$8,640	\$10,989	\$9,311

In the adult program, participants are typically low income (80%), single parents (42%) and African-American (36%). These participants are also the least likely to obtain and retain employment following exit from the program. Our focus in the next two program years will be to examine these participant groups and the mix of services they receive to determine what more can be done to improve their outcomes.

The Division maintains a data warehouse that is Internet accessible and available to any State and local staff who have requested secured access to the site on which the warehouse resides. This warehouse is developed using Business Objects and Web Intelligence (WEBI) software applications. The warehouse has numerous reports that track targeted populations based on services received, participant characteristics, co-enrollment and caseload management. The reports are updated and refreshed on a weekly basis and allow staff to monitor program and participant activities for active as well as exited participants.

Annually, following the submission of the WIA Annual Report, performance staff produce a WIA Title 1 Performance Achievement Report that tracks outcomes for participants in target groups. Examples of the various reports are included below. Local WDA samples and multiple program years are available upon request.

Statewide Employment Retention for Targeted Populations Program Year 2004

	Employed in Q1 after Exit		Employed in Q3 after Exit		Employed in Q5 after Exit	
Adults	Male	Female	Male	Female	Male	Female
Limited English Language Proficiency	27	65	21	59	19	50
Single Parent	154	730	130	672	120	602
UC Claimant or Exhaustee	124	237	118	221	107	203
Low Income	518	1181	448	1085	396	975
TANF	42	318	38	285	33	252
General Assistance	21	135	18	122	17	107
Pell Grant	29	166	26	155	23	143
Displaced Homemaker	0	7	0	6	0	5

Dislocated Workers	Male	Female	Male	Female	Male	Female
Limited English Language Proficiency	81	46	76	44	64	39
Single Parent	154	425	146	410	135	391
UC Claimant or Exhaustee	1614	1571	1552	1516	1467	1447
Low Income	23	70	22	65	20	60
TANF	0	22	0	20	0	18
General Assistance	0	3	0	3	0	3
Pell Grant	58	114	57	112	53	106
Displaced Homemaker	6	46	6	42	6	41

Youth	Male	Female	Male	Female	Male	Female
Basic Literacy Skills Deficient	312	331	263	282	229	237
Out-of-School Youth	156	224	134	198	119	173
Homeless, Runaway or Foster child	35	64	32	54	28	43
Pregnant or Parenting	35	197	27	176	25	156
Offender	110	41	92	36	79	31
Needs Additional Assistance	393	573	331	494	291	432

**Statewide Average Earnings for Targeted Populations
Program Year 2004**

	Average Earnings Q1 after Exit		Average Earnings Q2 after Exit		Average Earnings Q3 after exit		Average Q2 & Q3 Earnings for those employed in all 3 quarters	
Adults	Male	Female	Male	Female	Male	Female	Male	Female
Limited English Language Proficiency	4827	3302	4784	3589	5193	3340	11558	7754
Single Parent	4043	3919	3640	3917	3974	4080	8789	7998
UC Claimant or Exhaustee	5614	4266	5570	4132	6260	4342	12520	8908
Low Income	4433	3848	4401	3820	4668	3931	10015	8380
TANF	4743	3678	4816	3764	5043	3948	11217	8495
General Assistance	4055	3236	4259	3151	3729	3406	9390	6966
Pell Grant	5253	5361	5283	5454	5239	5651	11113	11706
Displaced Homemaker	0	5081	0	5317	0	4123	0	10040

Dislocated Workers	Male	Female	Male	Female	Male	Female	Male	Female
Limited English Language Proficiency	7137	5256	7085	5396	7365	5013	15036	10759
Single Parent	6870	5492	6991	5467	7103	5851	14269	11450
UC Claimant or Exhaustee	7821	5829	7885	5732	8004	5940	16128	11954
Low Income	7271	4672	6844	4787	8017	5518	15836	10319
TANF	0	4829	0	4875	0	4522	0	9695
General Assistance	0	2693	0	2445	0	2007	0	5081
Pell Grant	7016	6321	7216	6223	7265	6391	15086	13209
Displaced Homemaker	7354	5065	7802	5001	7758	5079	15560	10721

Youth	Male	Female	Male	Female	Male	Female	Male	Female
Basic Literacy Skills Deficient	2556	2214	2736	2181	2681	2322	6314	5325
Out-of-School Youth	2799	2779	2729	2704	2827	2825	6237	6169
Homeless, Runaway or Foster child	2678	1848	2729	1791	3084	1864	7231	4607
Pregnant or Parenting	2255	3182	2485	2870	3159	2998	6238	6730
Offender	2616	2730	2483	2308	2430	2661	6023	5975
Needs Additional Assistance	2520	2413	2686	2451	2550	2463	5866	3296

**Statewide Race and Ethnicity Employment Outcomes
Program Year 2004**

WIA Title 1 Adult Program 2720 Exited

Hispanic or Latino	American Indian or Alaska Native	Asian	Black or African American	Hawaiian or Pacific Islander	White
180	77	45	961	24	1587

	Employed in Q1 after exit.	Retained employment in Q2 after exit.	Retained employment in Q3 after exit.
Hispanic or Latino	138	129	116
American Indian or Alaska Native	65	57	52
Asian	39	38	35
Black or African American	670	587	514
Hawaiian or Pacific Islander	16	14	13
White	1318	1122	1028

WIA Title 1 Dislocated Worker Program 4678 Exited

Hispanic or Latino	American Indian or Alaska Native	Asian	Black or African American	Hawaiian or Pacific Islander	White
204	54	78	384	20	4106

	Employed in Q1 after exit.	Retained employment in Q2 after exit.	Retained employment in Q3 after exit.
Hispanic or Latino	170	162	147
American Indian or Alaska Native	45	43	40
Asian	69	68	59
Black or African American	312	297	285
Hawaiian or Pacific Islander	19	19	18
White	3558	3421	3260

WIA Title 1 Youth Program 1903 Exited

Hispanic or Latino	American Indian or Alaska Native	Asian	Black or African American	Hawaiian or Pacific Islander	White
145	50	99	588	9	1138

	Employed in Q1 after exit.	Retained employment in Q2 after exit.	Retained employment in Q3 after exit.
Hispanic or Latino	87	74	64
American Indian or Alaska Native	29	24	23
Asian	68	38	33
Black or African American	360	300	257
Hawaiian or Pacific Islander	6	6	4
White	775	673	581

X. D. 3. Additional Outcomes

Wisconsin uses the 17 WIA federally required performance measures. No additional measures have been established.

X. D. 4. Common Data System and Reporting Processes

As stated above, ASSET is Wisconsin's common data collection system. Data is extracted from this system to prepare and submit all WIA quarterly and annual reports. In addition to ASSET, DWD has invested substantial effort and resources into the development of a Job Center Systems Data Warehouse that contains data and reports requested by local boards and other state staff. The warehouse is Internet-accessible and requires security clearance to access the data contained within it. Performance staff also prepare reports and data sets for local boards' use and provide extensive performance measure analysis of the results for each quarterly and annual report.

As a result of the corrective action analyses that are currently underway, additional reports are being prepared for the WDBs to provide them with employment and aggregate earnings data over the four quarters after participants exit WIA. Employment retention continues to be a key performance theme for local boards' PY2007-08 plans.

X. D. 5. Ensuring Collaboration and Continuous Improvement

The primary mechanism that DWD will use to ensure coordination and collaboration among key partners will be state policy guidance to WDBs for development of their two year plans and Job Center systems. Interagency and inter-program coordination efforts will be supported with assistance of the CWI State Interagency Team.

DWD guidance will include requirements for coordination and collaboration in local planning, guidance in development of MOUs for Job Center partners, and development of other policy and administrative requirements as needed. Plan review will consider the extent to which WDA plans reflect this policy guidance. DWD monitoring will incorporate review of collaboration efforts.

Collaboration and partnership development is an expectation of state level initiatives; evaluation of such projects will include consideration of collaboration and partnership, including resource sharing, as a condition of funding. Project progress and accomplishments will be reviewed through regular project progress reports and final reports.

X. D. 6. State and Local Performance Evaluation

State and local boards evaluate performance through a variety of mechanisms including:

- Quarterly and annual report production, review and distribution;
- Individualized case and performance measure reviews to identify reporting errors and possible system deficiencies;
- Customer satisfaction surveys;
- Technical assistance and consultation with local boards and state staff on performance related issues;
- Performance measure training upon request; and
- Data validation results.

WDBs use the Corrective Action Review Process to analyze performance issues by identifying causes and drawing conclusions about why performance standards may or may not have been achieved. As part of their corrective actions, WDBs are asked to complete a self-assessment survey. The results of the assessment suggest possible solutions to performance deficiencies and are the basis for developing plans for technical assistance and training. The assessment also identifies "best practices" among areas that are achieving performance goals. During the corrective action process, WDBs examine the impacts of the following on their WIA performance: state and local economy, service design of their WIA programs, and service delivery issues.

All WDBs are required to have in place a local plan which meets the requirements found in Section 118 of the WIA. In an effort to ensure that local WDB activities are moving in the strategic direction of our workforce system, DWD provides WDBs with a local workforce plan template that includes sections and questions on how local areas

are implementing national and state strategies, e.g., demand driven system and *Grow Wisconsin* Initiative. Then, during the plan review process, WDBs provide specifics on how they are implementing these workforce strategies in their local areas. In addition, information on any workforce strategy is shared with WDB executive directors at their monthly WAJTE meetings.

Wisconsin follows a corrective action and sanction process that is consistent with the procedures outlined in DOL TEGL 8-99. Beginning in PY2003, Wisconsin has become much more prescriptive with local boards facing a corrective action or sanction. Required activities are determined based on those deficiencies that appear to contribute to failed performance. DWD provides training and additional technical assistance as needed to improve poor performance and encourages continuous improvement for those boards that are performing well.

When WDBs consecutively fail one or more of the WIA performance standards, DWD implements WIA Section 136 (h) (2)(A); Regulations 661.355 and 660.420 that requires the Governor to take corrective action when a WDB has failed the same performance standard for two years in a row. In addition, the Workforce Programs Guide Part 2 (I)(C)(6) supports the requirement by stating "DWD must take corrective action." The State implements sanction policy as specified in *Part 2-Workforce Investment Act Program Guide, I. General Requirements for WIA Title I Programs* (b) (1)(a-b).

The sanction process has two phases:

The first phase occurs when a WDB fails one or more performance measures in any given year. If this occurs, DWD will provide technical assistance. This includes helping the WDB to develop a performance improvement plan with the following components:

- Statement regarding which performance indicators will be improved through implementation of the plan;
- Analysis of performance problem, including a description of problem solving techniques used to determine the most likely causes of the problem and a description of the most likely causes;
- Identification of possible actions to improve performance, and descriptions of the actions the WDB will take to improve; and
- A timetable for implementing the selected solutions.

If a WDB fails to meet the negotiated performance levels or customer satisfaction indicators for a program for two consecutive program years, DWD must take corrective action (Phase 2). Corrective action may include the development of a reorganization plan, under which the Governor:

- Requires the appointment and certification of a new WDB;
- Prohibits the use of particular service providers or Job Center partners that have been identified as achieving poor levels of performance; or
- Requires other appropriate measures designed to improve local performance.

The results of past efforts can be demonstrated by the fact that in PY03, four WDBs were subject to continuing corrective action for failed performance measures. In PY04, only one WDB was subject to corrective action. In PY05, no WDB was subject

to corrective action, although two required some technical assistance to improve performance in two of the Younger Youth performance measures.

X. D. 7. Preparation for New Reporting Requirements

Wisconsin has reviewed DOL's proposed WIA Streamlined Reporting system (WISPR) and submitted comments for the department's consideration before making any adjustments to current reporting processes. Staff continue to subject the WIA Title 1 Data Validation software to rigorous testing with the intent of eventually using this software to produce all Federal quarterly and annual reports.

X. D. 8. Proposed Performance Level for Each Measure

See Attachment N.

X. E. Administrative Provisions

X. E. 1. Appeal Process

For this purpose, DWD uses the appeal process identified earlier in VIII. A.3.

X. E. 2. Non-Discrimination Compliance

The State ensures compliance with the non-discrimination requirements as described in the equal opportunity MOA Recertification.

XI. Assurances

1. The state assures that it will establish, in accordance with section 184 of the WIA, fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the state through the allotments made under sections 127 and 132. (~1 12(b)(1 1)). The state is audited by the Wisconsin Legislative Audit Bureau.
2. The state assures that it will comply with section 184(a)(6), which requires the Governor to, every two years, certify to the Secretary, that -
 - a. the state has implemented the uniform administrative requirements referred to in section 184(a)(3);
 - b. the state has annually monitored local areas to ensure compliance with the uniform administrative requirements as required under section 184(a)(4); and
 - c. the state has taken appropriate action to secure compliance with section 184 (a)(3) pursuant to section 184(a)(5). (~ 184(a)(6).)
3. The state assures that the adult and youth funds received under the WIA will be distributed equitably throughout the state, and that no local areas will suffer significant shifts in funding from year to year during the period covered by this Plan. (~1 12(b)(12)(B).)
4. The state assures that veterans will be afforded employment and training activities authorized in section 134 of the WIA, and the activities authorized in chapters 41 and 42 of Title 38 US code. The state assures that it will comply with the veterans priority established in the *Jobs for Veterans Act. (38 USC4215)* and Employment and Training Administration Guidance Letter No. 5-03, dated September 16, 2003.
5. The state assures that the Governor shall, once every two years, certify one local board for each local area in the state. (~1 17(c)(2).)
6. The state assures that it will comply with the confidentiality requirements of section 136(f)(3).
7. The state assures that no funds received under the WIA will be used to assist, promote, or deter union organizing. (~ 181 (b)(7).)
8. The state assures that it will comply with the nondiscrimination provisions of section 188, including an assurance that a MOA has been developed and implemented (~ 188.)
9. The state assures that it will collect and maintain data necessary to show compliance with the

nondiscrimination provisions of section 188. (~185.).

10. The state assures that it will comply with the grant procedures prescribed by the Secretary (pursuant to the authority at *section 189(c)* of the Act) which are necessary to enter into grant agreements for the allocation and payment of funds under the Act. The procedures and agreements will be provided to the state by the ETA Office of Grants and Contract Management and will specify the required terms and conditions and assurances and certifications, including, but not limited to, the following:
 - General Administrative Requirements:
 - 29 CFR part 97 --Uniform Administrative Requirements for State and Local Governments (as amended by the Act)
 - 29 CFR part 96 (as amended by OMB Circular A-133) --Single Audit Act
 - OMB Circular A-87 --Cost Principles (as amended by the Act)
 - Assurances and Certifications:
 - SF 424 B --Assurances for Non-construction Programs
 - 29 CFR part 37 --Nondiscrimination and Equal Opportunity Assurance (and regulation) 29 CFR § 37.20
 - CFR part 93 --Certification Regarding Lobbying (and regulation)
 - 29 CFR part 98 --Drug Free Workplace and Debarment and Suspension
 - Certifications (and regulation)
 - Special Clauses/Provisions:

Other special assurances or provisions as may be required under Federal law or policy, including specific appropriations legislation, the WIA, or subsequent Executive or Congressional mandates.
11. The state certifies that the Wagner-Peyser Act Plan, which is part of this document, has been certified by the State Employment Security Administrator.
12. The state certifies that veterans' services provided with Wagner-Peyser Act funds will be in compliance with 38 U.S.C. Chapter 41 and 20 CFR part 1001.
13. The state certifies that Wagner-Peyser Act-funded labor exchange activities will be provided by merit-based public employees in accordance with DOL regulations.
14. The state assures that it will comply with the MSFW significant office requirements in accordance with 20 CFR part 653.
15. The state certifies it has developed this Plan in consultation with local elected officials, local workforce boards, the business community, labor organizations and other partners.
16. As a condition to the award of financial assistance from the DOL under Title I of WIA, the grant applicant assures that it will comply fully with the nondiscrimination and equal opportunity provisions of the following laws:
 - Section 188 of the WIA of 1998, which prohibits discrimination against all individuals in the US on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the United States or participation in any WIA Title I;
 - Financially assisted program or activity;
 - Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the bases of race, color and national origin;
 - Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
 - The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and
 - Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs. The grant applicant also assures that it will comply with 29 CFR part 37 and all other regulations implementing the laws listed above. This assurance applies to the grant applicant's operation of the WIA Title I-financially assisted program or activity, and to all agreements the grant applicant makes to carry out the WIA Title I-financially assisted program

or activity.

The grant applicant understands that the United States has the right to seek judicial enforcement of this assurance.

17. The state assures that funds will be spent in accordance with the WIA and the Wagner-Peyser Act and their regulations, written DOL Guidance implementing these laws, and all other applicable federal and state laws and regulations.

Acronyms

ALMIS America's Labor Market Information System
APS Access Point of Service
ASSET Automated System Support for Employment and Training
BDS Bureau of Division-Wide Services
BRG Business Relations Group
BWP Bureau of Workforce Programs
CBJT Community Based Job Training
CFR Code of Federal Regulations
CJC Comprehensive Job Centers
CLEO Chief Local Elected Official
CMDR Case Manager's Desk Reference
CNC Computerized Numerical Control
Commerce – Department of Commerce
CRC Civil Rights Compliance
CWI Council on Workforce Investment
DCTS Dane County Transition School
DHFS Department of Health and Family Services
DOC – Department of Corrections
DOL Department of Labor
DOT Department of Transportation
DPI Department of Public Instruction
DVR Division of Vocational Rehabilitation
DWD Department of Workforce Development
DWS Division of Workforce Solutions
ESIP Emerging Skills Industry Partnership
ETA US Employment and Training Administration
ETP List List of Eligible Training Programs and Providers
FFCYG Former Foster Care Youth Grant
FSET Food Stamp Employment and Training
GPR General Purpose Revenue
GROW Growing Regional Opportunities in Wisconsin
IT Information Technology

ITA Individual Training Accounts
IVR Interactive Voice Response
JNB JobNET Business
KEYS Keeping Education Among Youth for Success
LEP Limited English Proficiency
LMI Labor Market Information
LPL Local Program Liaison
LVER Local Veterans' Employer Representative
MAA Mutual Assistance Associations
MOA Methods of Administration
MOU Memorandum of Understanding
MSFW Migrant and Seasonal Farm Workers
MSSC Manufacturing Skills Standards Certification
NEG National Emergency Grant
NGA National Governor's Association
NTO Non-Traditional Occupations
OEA Office of Economic Analysis
OJT On-the-Job Training
OSO One-Stop Operator
PIC Private Industry Council
PLTW Project Lead The Way
PY Program Year
RAPIDS Reengineering Acquisition, Payment and Information Disposition Systems
RFP Request for Proposal
RISE Regional Industry Skills Education
SIT State Interagency Team
TAA Trade Adjustment Assistance
TANF Temporary Assistance for Needy Families
TAPR
TAT Technical Assistance and Training
TEGL
TRA Trade Readjustment Assistance
UI Unemployment Insurance
UMOS United Migrant Opportunity Services

US United States

VR Voice Response

W-2 Wisconsin Works (Wisconsin's TANF Program)

WAHRS Wisconsin Association for Homeless and Runaway Services

WAJTE Wisconsin Association of Job Training Executives (WDB Directors)

WDA Workforce Development Area

WDB Workforce Development Board (local)

WIA Workforce Investment Act

WID Workforce Information Database

WIRED Workforce Innovations in Regional Economic Development

WOTC Work Opportunity Tax Credit Program

WSTI Wisconsin Statewide Transition Initiative

WTCS Wisconsin Technical College System

Attachments

ETA Regional Administrator: Attachment A.....	99
Program Administration Designees and Plan Signature: Attachment B	100
Organizational Chart: Attachment C	101
Member List of the Governor's Council on Workforce Investment: Attachment D.....	102
Council on Workforce Investments: Attachment E	103
Workforce Development Areas Boundaries Map: Attachment F	108
GROW Grant Project Regions: Attachment G	109
Monitoring Guides: Attachment H.....	110
Complaints/Grievances and Appeals: Attachment I	155
Wisconsin's Job Center Service Standards: Attachment J	163
Administrator's Memo Series: Attachment K	169
Limited English Proficiency Plan: Attachment L	172
Veterans: Attachment M	184
Draft Proposed Performance Levels: Attachment N.....	184

Attachment A

ETA Regional Administrator

REGION 5 - CHICAGO/KANSAS CITY

Byron Zuidema

Regional Administrator

U.S. Department of Labor/ETA

230 S. Dearborn Street, Rm. 628

Chicago, Illinois 60604

(312) 596-5400

FAX: 312-596-5401

Zuidema.byron@dol.gov

Attachment B

Program Administration Designees and Plan Signature

Name of WIA Title I Grant Recipient Agency: Department of Workforce Development

Address: 201 East Washington Avenue A400, Madison, WI 53702

Telephone Number: 608-267-1410 TTY: 608-267-0477

Facsimile Number: 608-266-1784

E-mail: roberta.gassman@dwd.state.wi.us

Name of WIA Title I Signatory Official: Roberta Gassman, Secretary, Department of Workforce Development

Address: 201 East Washington Avenue A400, Madison, WI 53702

Telephone Number: 608-267-1410 TTY: 608-267-0477

Facsimile Number: 608-266-1784

E-mail Address: roberta.gassman@dwd.state.wi.us

Name of WIA Title I Liaison: Ron Danowski, Division Administrator, Division of Employment and Training

Address: 201 East Washington Avenue, G108, Madison, WI 53702

Telephone Number: 608-266-3485

Facsimile Number: 608-261-8506

E-mail Address: ron.danowski@dwd.state.wi.us

Name of Wagner-Peyser Act Grant Recipient/State Employment Security Agency:

Roberta Gassman, Secretary, Department of Workforce Development

Address: 201 East Washington Avenue A400, Madison, WI 53702

Telephone Number: 608-267-1410 TTY: 608-267-0477

Facsimile Number: 608-266-1784

E-mail Address: roberta.gassman@dwd.state.wi.us

Name and title of State Employment Security Administrator (Signatory Official):

Roberta Gassman, Secretary, Department of Workforce Development

Address: 201 East Washington Avenue A400, Madison, WI 53702

Telephone Number: 608-267-1410 TTY: 608-267-0477

Facsimile Number: 608-266-1784

E-mail Address: roberta.gassman@dwd.state.wi.us

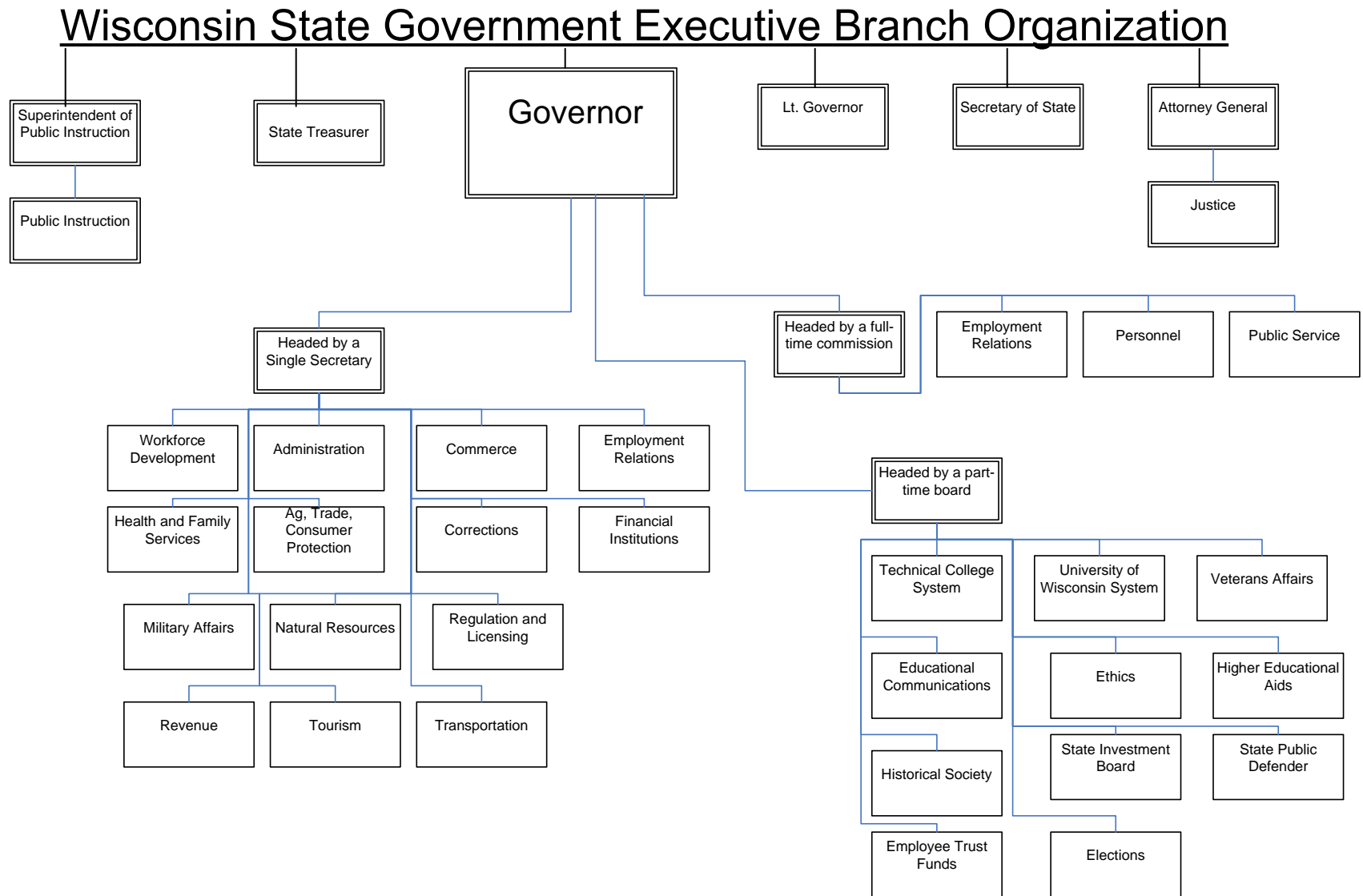
As the Governor, I certify that for the State of Wisconsin, the agencies and officials designated above have been duly designated to represent the State/Commonwealth in the capacities indicated for the Workforce Investment Act, Title I, and Wagner-Peyser Act grant programs. Subsequent changes in the designation of officials will be provided to the U.S. Department of Labor as such changes occur.

I further certify that we will operate our Workforce Investment Act and Wagner-Peyser Act programs in accordance with this Plan and the assurances herein.

Typed Name of Governor_____

Signature of Governor_____ Date_____

Attachment C
Organizational Chart



For a more detailed view of the Wisconsin State Government organization chart see <http://www.legis.state.wi.us/lrb/bb/231-240.pdf>

Attachment D

Member List of the Governor's Council on Workforce Investment

Jim Doyle, Governor, State of Wisconsin
Paul A. Linzmeyer, Council Chair, President of Bay Towel Inc., Green Bay
Daniel Andrist, Sales Consultant, Dorsch Ford KIA, Green Bay
Lyle A. Balistreri, President, Milwaukee Building & Construction Trades Council, Milwaukee
Colleen Bates, Eau Claire County Supervisor, Eau Claire
Robert T. Borremans, Executive Director, Southwest Wisconsin Workforce Development Board, Platteville
Mary P. Burke, Secretary, Wisconsin Department of Commerce
Elizabeth "Libby" Burmaster, State Superintendent, Department of Public Instruction
Thomas L. Burse, President, Buveck Consultants/Construction Managers, Milwaukee
William Chaudoir, Executive Director, Door County Economic Development Corporation, Sturgeon Bay
Daniel Clancy, President, Wisconsin Technical College System
Jewel Currie, Director of Field Support, WE Energies, Milwaukee
Kathleen Drengler, Manager of Training and Development, Greenheck Fan Corp., Wausau
Barbara Fleisner, Vice President of Economic Development, Green Bay Chamber of Commerce, Green Bay
Matthew Frank, Secretary, Wisconsin DOC
Roberta Gassman, Secretary, Wisconsin Department of Workforce Development
James Haney, President, Wisconsin Manufacturers and Commerce (WMC), Madison
Susan Hatch, President, Hatch Staffing Services, Milwaukee
John Heyer, President and Owner, Kettle Moraine Coatings, Jackson
James P. Hill, Executive Director, La Crosse Area Development Corporation (LADCO), La Crosse
Tina Koehn, Vice President Administration, UMOS Inc., Menomonee Falls
Senator Joe Leibham (R), Wisconsin State Senate, 9th District, Sheboygan
Debra Malewicki, Interim Director, Wisconsin Small Business Development Centers, University of Wisconsin Extension, Madison
Kevin Hayden, Secretary, Wisconsin Department of Health and Family Services
Phil Neuenfeldt, Secretary-Treasurer and Legislative Director, State AFL-CIO, Milwaukee
A. Kent Olson, President and Owner, Olson Tire & Auto Services Inc., Wausau
Lee Rasch, Ph.D., President, Western Technical College, La Crosse
Mark Reihl, Executive Director, Wisconsin State Council of Carpenters, Madison
Joel Rogers, Professor, University of Wisconsin-Madison
Donald L. Rouse, retired Vice President Corporate Operations, Kohl's Department Stores, Hartland
Christopher A. Ruud, Executive Vice President, Ruud Lighting, Racine
John Scocos, Secretary, Wisconsin Department of Veterans Affairs
Julia H. Taylor, President, Greater Milwaukee Committee, Milwaukee
Dean Welch, Vice President of Operations, IT Convergence, Madison
Joan Wilk, Professor, College of Nursing, University of Wisconsin-Milwaukee
Representative Josh Zepnick (D), Wisconsin State Assembly, 9th District, Milwaukee

Attachment E

Council on Workforce Investments

BY-LAWS

Approved by the CWI on September 10, 2004

ARTICLE I. Name

The name of the organization shall be the Governor's Council on Workforce Investment.

ARTICLE II. Organization

2.1 Membership

The membership of Governor's Council on Workforce Investment is designated by the enabling Governor's Executive Order establishing the Council and in accordance with the Workforce Investment Act (WIA) of 1998. The Council shall be comprised of:

- 1) The Governor or designee
- 2) The majority of representatives of business in the state;
- 3) The state departments of Commerce, DOC, Health and Family Services, Public Instruction, Veterans Affairs, Workforce Development, the University of Wisconsin, and the Technical College System State Board;
- 4) Individuals with experience in youth activities, community-based organizations, education, local government and workforce development issues;
- 5) Individuals who are representatives of organized labor and who have been nominated by State labor federations, and; 6) Two members of each of the two chambers of the State Legislature appointed by the respective leadership of the majority and minority parties (four in total.)

2.2 Appointment

2.2(1) Council Members

The members of the Council are appointed by the Governor, except for the legislative representatives, and serve at the Governor's pleasure. Legislators are selected by the respective majority and minority party leadership of each House. Any vacancy will be filled consistent with the representation requirements of the Workforce Investment Act of 1998. The Chairperson shall determine when a vacancy occurs and so inform the Governor.

2.2(2) Council Representation

- Council members who due to job change or other reasons no longer represent the sector from which they were appointed may serve until their replacements are named.
- Council members may select an official designee to attend Council and
- Committee meetings that they are unable to attend. The name of the
- designee should be formally conveyed in writing to the Chairperson.

- If a seat on the Council is not represented by the appointee or designee for three consecutive Council meetings, the Council Chairperson may recommend termination and replacement to the Governor. For legislators, the Chairperson may notify the appropriate legislative leaders.
- Members who are unable to continue serving on the Council should notify the Chairperson in writing.

2.2(3) Committee Membership

The Council Chairperson appoints members of standing committees and ad-hoc committees unless expressly appointed by the Governor.

2.2(4) Non-voting Technical Advisors

Non-voting Technical Advisors may be invited to join committees by the Committee leadership, with concurrence of Council Chairperson, for a specified term. These members would serve as resource persons on standing committees based on the knowledge or perspective they bring to the work of the committee.

2.3 Voting

2.3(1) Council

Each member of the Council shall have one vote. Only gubernatorial appointees, or their official designees, and legislators are voting members of the full Council.

2.3(2) Committees

Only gubernatorial appointees, or their official designees, and legislators may vote on standing Council committees. Non-voting technical advisors may participate on standing committees but may not vote. All members of ad hoc committees may vote, due to the special assignment of an ad hoc committee.

2.4 Conflict of Interest

Council members are state public officials as defined by ss. 19.42, *Wis. Stat.*, and are subject to ss. 19.46, *Wis. Stat.*, concerning conflict of interest prohibitions including but not limited to: (1) taking any official action substantially affecting a matter in which the official, a member of his or her immediate family, or an organization with which the official is associated has a substantial financial interest; and (2) using his or her office or position in a way that produces or assists in the production of a substantial benefit, direct or indirect, for the official, one or more members of the official's immediate family either separately or together, or an organization with which the official is associated.

2.5 Staffing of the State Council

The Wisconsin Department of Workforce Development shall be the lead agency in providing staff support for the Council with assistance from other agencies as appropriate and necessary.

ARTICLE III. Officers and Terms

3.1 Council Chairperson

The Chairperson of the Council must be from the business sector, and shall be appointed by the Governor to serve at his/her pleasure. The Chairperson shall preside at all meetings of the Council. If both the Chairperson and the Vice Chairperson will be absent from a Council meeting, the Chairperson shall assign another member of the Council to preside over the meeting. The Chairperson shall be responsible for the management of the business of the Governor's Council on Workforce Investment. The Chairperson shall convene regular and, when appropriate, special meetings of the Council.

3.2 Vice Chairperson

The Council Chairperson shall select a Vice-Chairperson from among the membership. The Vice-Chairperson shall, in the absence of the Chairperson, perform the duties of the Chairperson.

3.3 Committee Chairs

The Council Chairperson shall appoint committee Co-Chairs unless otherwise expressly appointed by the Governor. The Committee Chairs shall convene committee meetings as needed to address their workplans and other issues as directed by the full Council.

ARTICLE IV. Meetings

4.1 General

The Council shall meet quarterly or at the call of the Chairperson.

4.2 Notice

Notice of meetings of the Council, its standing committees, and ad hoc committees shall be given to all members at least seven days prior to the date of the meeting, along with an agenda of items for consideration at such meeting. Mailing by email or surface mail to the member's registered address shall be deemed adequate notice. Public notice as provided under the Wisconsin Open Meeting Law shall be given prior to each meeting.

4.3 Quorum

A majority of Council members, or their official designees, shall constitute a quorum for the purpose of conducting official business of the Council. A majority of any standing or ad hoc committees are also required for the purpose of the business of that committee. At the committee level, non-voting technical advisors do not count towards a quorum. All members of ad hoc committees can be counted towards a quorum.

ARTICLE V. Committees

5.1 Standing Committees

The Council shall have standing committees to help conduct its business. Additional non-voting technical advisors can be appointed. A committee may establish subcommittees to assist in performing committee responsibilities. The Council Chairperson shall appoint the leadership and members of the committees unless expressly appointed by the Governor. The decisions of a committee shall be recommendations only and subject to approval by the full Council except when the standing committee acts on behalf of the Council based on prior authority granted by the Council for a specific purpose. The co-chairpersons of the committee shall establish appropriate rules for management of the committee's business.

5.2 Executive Committee

The Executive Committee, at a minimum, shall be comprised of the Council Chairperson, Vice Chairperson, one Co-Chairperson from each of the standing committees, and the Secretary of the Department of Workforce Development. The Council Chairperson may appoint additional members as needed. The Executive Committee shall provide overall direction to Council activities, make recommendations on Council administrative and organizational matters as appropriate and may act on behalf of the Council. The committee shall perform additional duties as charged by the Council Chairperson.

5.3 Ad-Hoc Committees

The Council Chairperson may establish *ad-hoc* committees, workgroups or task forces to assist the Council in carrying out its responsibilities. The length of terms shall be determined by the Council Chairperson at the time of the appointment. Ad-hoc committees may include a combination of Council members and non-council members. The Chair of an ad-hoc committee must be a Council member.

5.4 Dislocated Worker Committee

The functions of the State Dislocated Worker Committee, as required by state administrative rule, may be included within a standing committee.

ARTICLE VI. Reimbursement of Expenses

Travel expenses incurred by members and ad hoc committee participants, other than state agency representatives, to attend meetings of the Council or its committees or other meetings approved by the Council shall be reimbursed in accordance with the state travel reimbursement policy.

ARTICLE VII. Amendment of By-laws

These by-laws may be amended by majority vote of the Council.

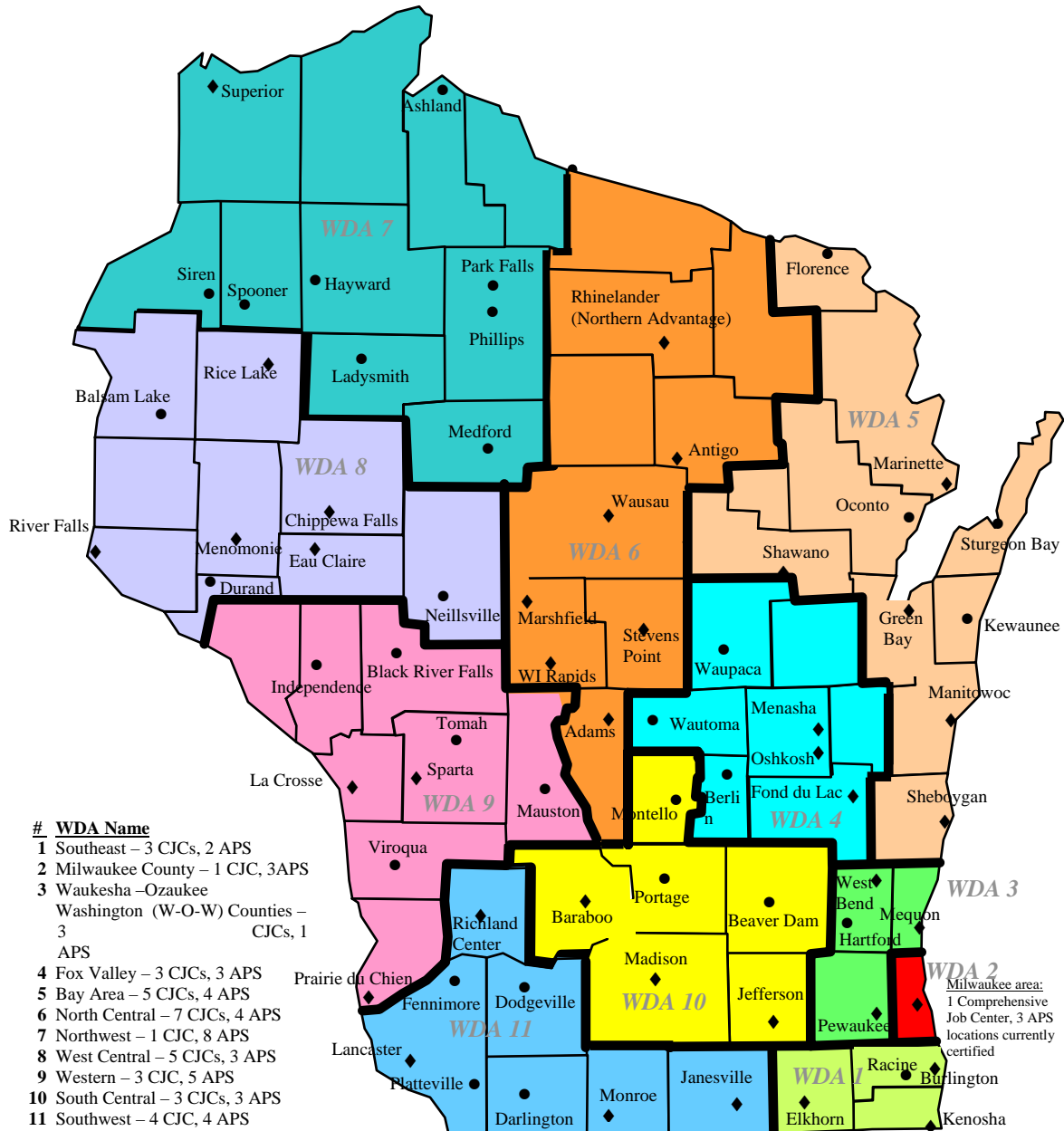
ARTICLE VIII. Roles and Responsibilities

The powers and duties of the Council are principally specified under the authorizing Executive Order and the federal Workforce Investment Act of 1998.

Attachment F

Comprehensive Job Centers and Access Points of Service Locations in Wisconsin's 11 Workforce Development Areas

- ◆ Comprehensive Job Center
- Access Points of Service Sites



WDA Name

- 1 Southeast – 3 CJC, 2 APS
- 2 Milwaukee County – 1 CJC, 3 APS
- 3 Waukesha – Ozaukee
Washington (W-O-W) Counties –
3 CJC, 1 APS
- 4 Fox Valley – 3 CJC, 3 APS
- 5 Bay Area – 5 CJC, 4 APS
- 6 North Central – 7 CJC, 4 APS
- 7 Northwest – 1 CJC, 8 APS
- 8 West Central – 5 CJC, 3 APS
- 9 Western – 3 CJC, 5 APS
- 10 South Central – 3 CJC, 3 APS
- 11 Southwest – 4 CJC, 4 APS

Total Number of CJC is 38
Total Number of APS is 40
Total CJC and APS is 78

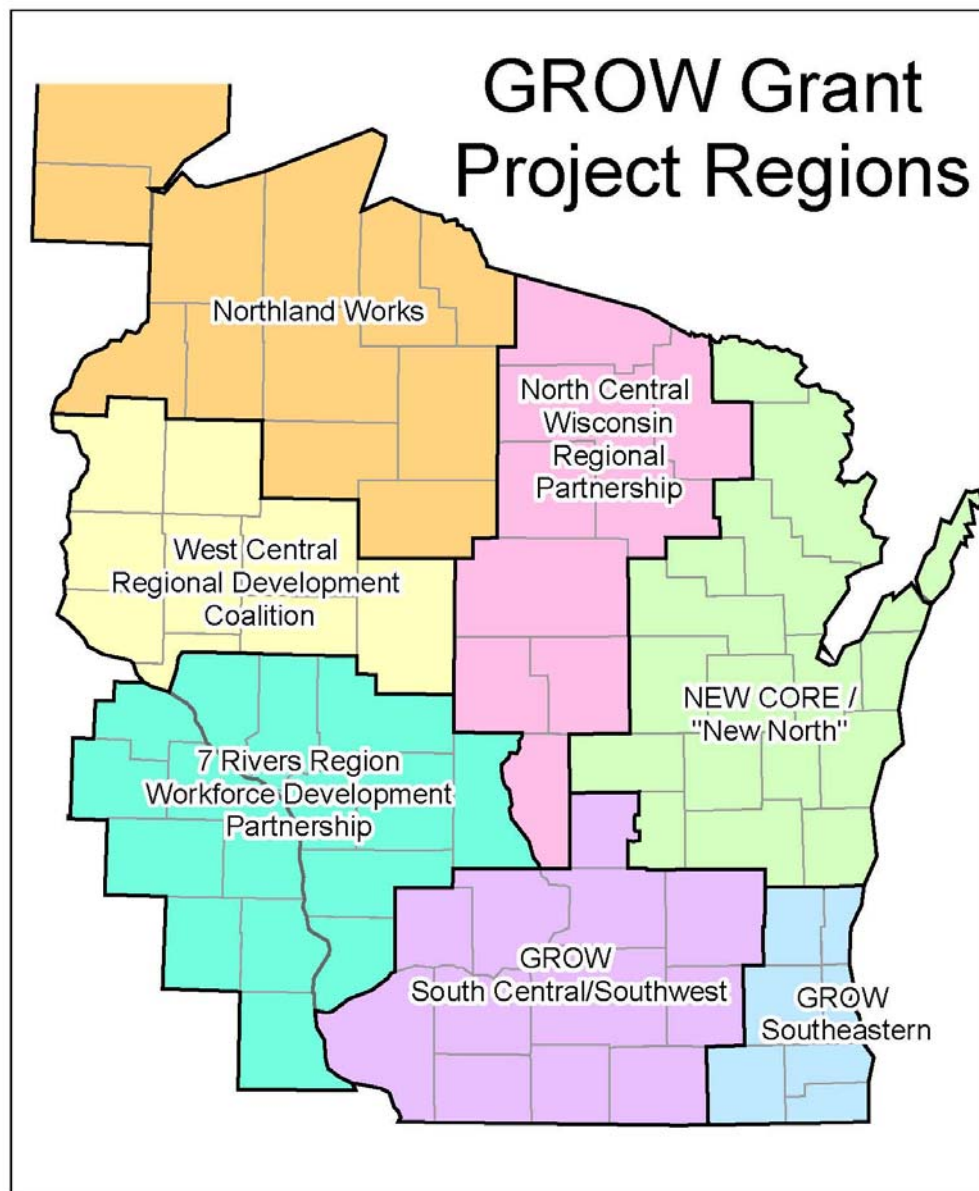
WDA 3

WDA 2
Milwaukee area:
1 Comprehensive
Job Center, 3 APS
locations currently
certified

02/16/07

Attachment G

GROW Grant Project Regions



Wisconsin Department of Workforce Development, Bureau of Workforce Information, April 2006
File: S:\DWS\BW\ArcGIS\Heather\GROW.mxd

Attachment H

Monitoring Guides

Overview - Program Year 2006 Onsite Monitoring Workforce Development Board Programs March 2007

As in the past, the Local Program Liaison assigned to your area will be the lead staff for monitoring in your Workforce Development Area (WDA). Due to workload issues, it may be necessary in some areas to conduct and report the program, fiscal, and civil rights monitoring separately.

Workforce Investment Act (WIA) areas to monitor during Program Year (PY) 2006 were identified based on technical assistance needs and issues identified during last year's onsite monitoring, WIA performance outcomes, Automated Systems Support for Employment and Training (ASSET) issues, and WIA policies released during the past year. In addition, some areas will be monitored in order to fulfill the Department of Workforce Development's (DWD) oversight responsibilities to the United States Department of Labor.

All Workforce Development Boards (WDB) will be monitored in the following areas:

1. WIA Title 1B Programs
 - Adult Program
 - Dislocated Worker
 - Older Youth
 - Younger Youth
2. Fiscal and Administrative Systems
 - Cost Allocation
 - Sub-Contracts
 - Single Audit
 - Agency Policies and Controls
 - Participant and Support System
 - Direct Labor
 - Other Direct Costs
 - Fiscal Reporting
 - Procurement
 - Program Income
 - Executive Staff Salaries and Benefits
3. WIA 35% High Wage Training Requirement
4. WIA Job Center Criteria and Service Standards
5. Global Exclusions – Documentation will be reviewed for all participants that had global exclusions reported in ASSET during the PY 2005 performance period.
6. Supplemental Wage Data - Supplemental wage source documents will be reviewed for all participants that had supplemental earnings reported to Division of Workforce Solutions (DWS) during the PY 2005 performance period.

Documents to Be Available for DWS Onsite Monitoring Program Year 2006

The following documents, as applicable, should be readily available for the onsite review. In addition, Division of Workforce Solutions (DWS) staff may request specific documents prior to the scheduled onsite work in order to prepare for the monitoring.

Program Policies and Procedures – Local (WDB) policies related to the following:

Intake and enrollment

Referral

Assessment

Individual Employment Plan/Individual Service Strategy (IEP/ISS) development

Case management

Training

- Classroom training
- Work experience

Financial Management and Administrative Controls

Cost Allocation Plans

Memorandum of Understanding (MOUs)/Job Center Agreements

Policies, procedures and documentation for participant payments

Fee for Service and Program Revenue Activities

Executive Staff Salaries and Benefits

Procurement Policies and Practices

List of subgrants by each DWS funded program

Procurement manuals

Requests for Proposals

Proposals

Proposal scoresheets

Cost/price analysis worksheets

Subgrantee/Service Provider Contracts

WDB Monitoring of Contractors and Service Providers

Monitoring documentation (completed monitoring tools, monitoring reports and resolutions)

Participant Files - The Local Program Liaison will request a sample of participant files to be available for the review. Files will be selected for review based on program, participant activities and Workforce Development Areas (WDA) and service provider configuration. The complete record that pertains to each participant selected needs to be made available. The following documents, as applicable, will be reviewed for each participant record selected:

- ☐ Local application form (or ASSET Registration with work history)
- ☐ Eligibility Determination or Program Registration Form
- ☐ Individual Employment Plan/Individual Service Strategy
- ☐ Employability Plan
- ☐ Assessment Information
- ☐ Documentation/verification of information used to determine eligibility (for programs and program activities)

- ☐ Authorization for Release of Information
- ☐ Participant's Rights and Responsibilities
- ☐ Case notes documenting contact with the participant, progress in the program and follow up activities (if not in ASSET)
- ☐ Contracts for employer-based training (OJT, work experience, etc.)
- ☐ Other materials as applicable that support or document participant eligibility or activities, e.g., job search activity records, supportive service referrals, training attendance records, applications for financial aid, etc.

Adult/ Dislocated Worker File Review

Participant Name:	PIN:
WDA:	Service Provider:
Reviewer:	Review Date:
PARTICIPANT DATA, GENERAL ELIGIBILITY & CASE DOCUMENTS: <input type="checkbox"/> Adult <input type="checkbox"/> Dislocated Worker <input type="checkbox"/> SRR <input type="checkbox"/> Yes <input type="checkbox"/> No Local application form signed & dated <input type="checkbox"/> Yes <input type="checkbox"/> No Age verification <input type="checkbox"/> Yes <input type="checkbox"/> No U.S. citizen or eligible to work in U.S. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Selective Service documented <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Vets documentation <input type="checkbox"/> Yes <input type="checkbox"/> No Participant Rights/Complaint form <input type="checkbox"/> Yes <input type="checkbox"/> No Release of Information form <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A PELL/Other Financial aid <input type="checkbox"/> Yes <input type="checkbox"/> No NTO Orientation <input type="checkbox"/> Yes <input type="checkbox"/> No Case notes (comprehensive, up-to-date, WIA & non-WIA)	COMMENTS:
DISLOCATED WORKER ELIGIBILITY: <input type="checkbox"/> Yes <input type="checkbox"/> No Qualifying dislocation date documented _____ <input type="checkbox"/> Yes <input type="checkbox"/> No Special Response Grant Eligible. If yes: SR Grant # _____ Company _____ Meets all State eligibility: <input type="checkbox"/> Yes <input type="checkbox"/> No Dislocated in last 5 years <input type="checkbox"/> Yes <input type="checkbox"/> No Previous work history (2 years if 22 or older, 4 years if not) <input type="checkbox"/> Yes <input type="checkbox"/> No No specific recall date AND Meets one Federal eligibility (all criteria from one of the five below): <input type="checkbox"/> Yes <input type="checkbox"/> No Received layoff notice and one of the following <input type="checkbox"/> Yes <input type="checkbox"/> No Eligible for or exhausted UI <input type="checkbox"/> Yes <input type="checkbox"/> No Not eligible for UI, but sufficient attachment to workforce <input type="checkbox"/> Yes <input type="checkbox"/> No Unlikely to return to previous field <input type="checkbox"/> Yes <input type="checkbox"/> No Substantial plant layoff or permanent closure <input type="checkbox"/> Yes <input type="checkbox"/> No General announcement that plant will close within 180 days <input type="checkbox"/> Yes <input type="checkbox"/> No Self employed, but economic conditions worsened <input type="checkbox"/> Yes <input type="checkbox"/> No Displaced homemaker <input type="checkbox"/> Yes <input type="checkbox"/> No Providing unpaid services in the home <input type="checkbox"/> Yes <input type="checkbox"/> No Dependent on family member's income and no longer supported by it	COMMENTS:

<input type="checkbox"/> Yes <input type="checkbox"/> No Unemployed/ underemployed with difficulty finding employment	
OBJECTIVE ASSESSMENT & INDIVIDUAL EMPLOYMENT PLAN (IEP) <input type="checkbox"/> Yes <input type="checkbox"/> No Objective Assessment (basic skills, prior work experience, interests/aptitudes, support service needs, NTO, etc.) <input type="checkbox"/> Yes <input type="checkbox"/> No IEP (based on assessment, employment goals, jointly developed) <input type="checkbox"/> Yes <input type="checkbox"/> No IEP includes non-WIA services; is reviewed & updated	COMMENTS:
CORE SERVICES: Date of first service _____ <input type="checkbox"/> Yes <input type="checkbox"/> No Other services (including non-WIA) provided/ referred <input type="checkbox"/> Yes <input type="checkbox"/> No Services related to assessment <input type="checkbox"/> Yes <input type="checkbox"/> No Gap in service (documented)	COMMENTS:
INTENSIVE SERVICES: <input type="checkbox"/> Yes <input type="checkbox"/> No Intensive Services provided <input type="checkbox"/> Yes <input type="checkbox"/> No Participant meets local criteria for services/ documented <input type="checkbox"/> Yes <input type="checkbox"/> No Services related to IEP	COMMENTS:

TRAINING SERVICES: <input type="checkbox"/> Yes <input type="checkbox"/> No Training Services provided <input type="checkbox"/> Yes <input type="checkbox"/> No Participant meets local criteria for training services/ documented <input type="checkbox"/> Yes <input type="checkbox"/> No Training Plan <input type="checkbox"/> Yes <input type="checkbox"/> No ITA Vouchers in file <input type="checkbox"/> Yes <input type="checkbox"/> No Training related to IEP <input type="checkbox"/> Yes <input type="checkbox"/> No Other grants applied for <input type="checkbox"/> Yes <input type="checkbox"/> No Linked to available employment in area <input type="checkbox"/> Yes <input type="checkbox"/> No Completed training or on track to complete <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Job search assistance after completion	COMMENTS:
On The Job Training (OJT): <input type="checkbox"/> Yes <input type="checkbox"/> No Participant placed in OJT <input type="checkbox"/> Yes <input type="checkbox"/> No Training Plan <input type="checkbox"/> Yes <input type="checkbox"/> No Worksite Agreement <input type="checkbox"/> Yes <input type="checkbox"/> No Related to IEP	COMMENTS:
SUPPORTIVE SERVICES: <input type="checkbox"/> Yes <input type="checkbox"/> No Supportive Services provided <input type="checkbox"/> Yes <input type="checkbox"/> No Consistent with local policy <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Services coordinated with dual-enrolled programs	COMMENTS:
CERTIFICATE/CREDENTIAL <input type="checkbox"/> Yes <input type="checkbox"/> No Received a training service <input type="checkbox"/> Yes <input type="checkbox"/> No Credential reported in ASSET <input type="checkbox"/> Yes <input type="checkbox"/> No Credential documented in file <input type="checkbox"/> Yes <input type="checkbox"/> No Attained after program registration/before 3rd quarter after exit <input type="checkbox"/> Yes <input type="checkbox"/> No If the participation date is on 07/01/06 or after, does the credential reported meet the certificate definition and requirements per WIA Policy Update 06-07, June 29, 2006?	COMMENTS:

<p>OBJECTIVE ASSESSMENT & INDIVIDUAL SERVICE STRATEGY (ISS)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Objective Assessment (basic skills, occupational skills, prior work experience, interests/aptitudes, support service needs, NTO, etc.)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Individual Service Strategy (based on assessment, measurable skill attainment goals, jointly developed)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No ISS includes non-WIA services; is reviewed & updated</p>	<p>COMMENTS:</p>
<p>SKILL ATTAINMENT: (required for Younger Youth only)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No First goal set on date of first service</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No At least one goal set per year</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Basic skills goal (required if basic skills deficient)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Measurable goals; relate to assessment & ISS</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Documentation of goal(s) achieved</p>	<p>COMMENTS:</p>

LITERACY/NUMERACY GAIN (applies if participation date on/after 7/1/06): (required for Out-of-School Youth who are basic skills deficient) <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Pre-Test(s) completed & entered in ASSET (administered up to 6 months prior to first service date or within 60 days following date of first service) Name of Test*: _____ <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Post- test(s) completed (within one year from date of first service) <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Same test administered for pre- and post-tests	COMMENTS:
DESIGN FRAMEWORK & SERVICES: <input type="checkbox"/> Yes <input type="checkbox"/> No Design Framework (date entered _____) <input type="checkbox"/> Yes <input type="checkbox"/> No First Youth Service (date _____) <input type="checkbox"/> Yes <input type="checkbox"/> No Supportive Services (_____) <input type="checkbox"/> Yes <input type="checkbox"/> No Other services (including non-WIA) <input type="checkbox"/> Yes <input type="checkbox"/> No Services concur with assessment and ISS <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Gap in service (documented) <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Work Experience Agreement/OJT Contract	COMMENTS:
EXIT INFORMATION: <input type="checkbox"/> Yes <input type="checkbox"/> No Exit documented in case notes <input type="checkbox"/> Yes <input type="checkbox"/> No School status at exit reported in ASSET <input type="checkbox"/> Yes <input type="checkbox"/> No Follow-up services <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Supplemental employment data <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Exclusionary exit	COMMENTS:
YOUNGER YOUTH PLACEMENT & RETENTION: <input type="checkbox"/> Yes <input type="checkbox"/> No In secondary school at exit <input type="checkbox"/> Yes <input type="checkbox"/> No If no, is 3 rd quarter post-secondary, advanced training, employed, Military or apprenticeship? <input type="checkbox"/> Yes <input type="checkbox"/> No Acceptable documentation	COMMENTS:
YOUNGER YOUTH DIPLOMA/EQUIVALENT: <input type="checkbox"/> Yes <input type="checkbox"/> No Is high school diploma/equivalent reported in ASSET? <input type="checkbox"/> Yes <input type="checkbox"/> No Evidence in file (record & date) <input type="checkbox"/> Yes <input type="checkbox"/> No Attained after program registration/before 1 st quarter after exit	COMMENTS:
OLDER YOUTH CERTIFICATE/CREDENTIAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Credential reported in ASSET <input type="checkbox"/> Yes <input type="checkbox"/> No Employment, post-secondary education or advanced training in first quarter after exit <input type="checkbox"/> Yes <input type="checkbox"/> No Evidence in file <input type="checkbox"/> Yes <input type="checkbox"/> No Attained after program registration/before 3rd quarter after exit <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A If the participation date is on 7/1/06 or after, does the reported credential meet the certificate definition and requirements per WIA Policy Update 06-07 (dated June 29, 2006)?	COMMENTS:

*Acceptable tests – TABE (forms 7&8 or 9&10), ABLE, CASAS, WorkKeys, BEST, or BEST Plus.

Department of Workforce Development

Division of Workforce Solutions

Civil Rights Compliance and Equal Opportunity Monitoring Reviewer's Guide

**For DWS
WIA, TANF and Other State or
Federally
Funded Programs**

This guide is an adaptation of the National Association of State Workforce Agencies (NASWA) developed guide to conducting equal opportunity monitoring reviews.

Monitoring Reviewers Guide Table of Contents

Introduction.....	112
Monitoring Procedures.....	113
Data Analysis Check List.....	116
Entrance Conference Form.....	118
EO and Nondiscrimination Monitoring Review Instrument:	
• Element 1: Designation of EO Officer.....	119
• Element 2: Notice and Communication.....	121
• Element 3: Assurance.....	123
• Element 4: Universal Access.....	124
• Element 5: Compliance with Section 504 of the Rehabilitation Act Of 1973 & the American with Disabilities Act of 1990.....	125
• Element 6: Data and Information Collection and Maintenance.....	128
• Element 7: Monitor Sub-Recipients of funding from the Primary Recipient for Compliance.....	128
• Element 8: Complaint Processing Procedures.....	129
• Element 9: Corrective Actions/Sanctions.....	131
Program Recruitment and Assessment Form.....	132
Current Staffing Data Form.....	137
Participant File Review Worksheet.....	138
Client Interview Form.....	140
Summary - Interview results from Interviews with Clients.....	142
Employee Interview Form.....	143
Summary - Interview results from Interviews with Staff.....	145
Exit Meeting Form.....	146

INTRODUCTION

Recipients of federal financial assistance are required to ensure adherence to these laws, acts and regulations in the provision of services to program participants: Section 188 of the Workforce Investment Act of 1998 (WIA), 29 CFR Part 37, 45 CFR Part 80, and, Section 504 of the Rehabilitation Act of 1973. These regulations incorporate the statutory mandates articulated in Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments Act of 1972, as amended; Title VII of the Civil Rights Act of 1964, as amended; and the Americans with Disabilities Act of 1990.

This Monitoring Reviewer's Guide is applicable to any entity that administers a program or activity from United States Department of Health and Human Services (USDHSS), United States Department of Labor (USDOL), or United States Department of Agriculture (USDA), federal financial assistance received from the Department of Workforce Development, Division of Workforce Programs (DWS). That federal financial assistance may be direct or indirect. We use the term "recipient" in this guide, to denote the entity receiving assistance from DWS.

Each monitoring review will include:

- Desk review of the plan, data and commitments made at the time the plan was submitted will be conducted prior to a site visit.
- a statistical or quantifiable analysis of the records and data kept by the recipient, including analyses by race/ethnicity, sex, age, and disability status;
- an investigation of any significant differences found across groups in participation in the programs, activities, and employment as a result of the analysis;
- an assessment to determine if administrative obligations have been fulfilled, including recordkeeping, notice and communication;
- review of policies to ensure they are in place and nondiscriminatory;
- review of job training plans, contracts, assurances and similar agreements to ensure they are nondiscriminatory and they contain the required language
- review of procedures for ensuring compliance with Section 504;
- a system to ensure that individuals assigned responsibility for carrying out nondiscrimination requirements can do so effectively;
- review of procedures for obtaining prompt corrective action when noncompliance is found; and,
- Supporting documentation to show that commitments made in the WIA MOA are carried out (WIA only).

Civil Rights and Equal Opportunity Monitoring Procedures

- Monitoring visits are conducted on a regular schedule and may be conducted as a result of a request being made by a recipient or program participant.
- The responsibility for Equal Opportunity (EO) Monitoring of recipients of funding from the Division of Workforce Solutions (DWS), falls to the DWS lead Equal Opportunity Officer in the Bureau of Division-wide services. This is currently William Franks.
- The Monitoring Team is made up of the lead EO officer (William Franks) and at least one other Civil Rights Unit person. These staff work as a team with local EO officers in monitoring visits.
- All monitors are trained in and have an understanding of monitoring requirements of Section 188 of the Workforce Investment Act of 1998 (WIA), 29 CFR Part 37, 45 CFR Part 80, and, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments Act of 1972, as amended; Title VII of the Civil Rights Act of 1964, as amended; and the Americans with Disabilities Act of 1990.
- This document is the Civil Rights Compliance/EO monitoring instrument.
- This monitoring instrument addresses Civil Rights, LEP and all of the nine WIA/MOA elements.
- Prior to the onsite monitoring visit agencies may be asked to submit data that is needed in the desk review.
- As a result of any monitoring visit a written report will be produced along with corrective action measures that may be needed. Follow up visits are conducted as needed and indicated in the reports.
- The report will be sent to the contract manager and agency signatory(s) with a copy being kept by the Civil Rights Unit of DWS.

Civil Rights, Equal Opportunity and Nondiscrimination Monitoring Procedures

MONITORING REVIEW PROCESS

Notification and Request for Preliminary Information

Prior to conducting an on-site compliance review of a recipient, the reviewer will notify the appropriate Director/Administrator/contract manager approximately two to four weeks prior to the review. A request may be made for staffing data, which collects demographic information on staff, may be forwarded at this time along with a request for preliminary data as appropriate, such as data on applicants and clients, random sample applications, non-monetary determinations, reports, discrimination complaints, etc. The request will include instructions that the data be returned at least 10 days prior to the review.

This monitoring instrument is provided prior to the on-site review to allow the recipient time to prepare for our visit.

On-site Review

The focus of the on-site review is to determine compliance with civil rights, equal opportunity and non-discrimination requirements and to review significant differences or disparities identified during the desk review. Upon entering the site, the reviewer will meet with the appropriate Director/Administrator/Contract Manager and the Local EO Officer to discuss the scope of the review, make arrangements for client and staff interviews or file reviews, and to discuss preliminary findings of the data analysis from the desk review.

Areas of emphasis during the on-site review may include, but are not necessarily limited to:

1. Staff composition (agency labor force);
2. Management and client interviews;
3. Staff awareness of civil rights, equal opportunity and nondiscrimination laws;
4. Complaint files (if appropriate);
5. Client files;
6. Physical aspects of the site – programmatic and architectural accessibility;
7. Observance of reception, intake, and assessment processes – if applicable;
8. Maintenance of relevant policies and complaint files;
9. Interviews with community-based organizations – when complaints or concerns have been identified or expressed;
10. Agreements with local organizations to provide needed services to persons with special needs; and,
11. Display of announcements, mandatory posters, and posters or signs for clients with limited English-speaking abilities and visual or hearing disabilities.

Exit Meeting

Immediately following the review the reviewer will conduct an exit meeting with the appropriate Director/Administrator/Contract Manager or designee to discuss the findings and clarify areas in question. A preliminary compliance status will be given at this time and preliminary corrective action(s) suggested.

CORRECTIVE ACTION PROCESS

Follow-up

1. Within approximately thirty (30) working days of the completion of the review, the reviewer will prepare a written report.
 - a. The report will be disseminated to the appropriate Director/Administrator/Contract Manager
 - b. The report will discuss, in detail, areas of pending or non-compliance and outline those areas that are found to be in compliance.
2. When areas of non-compliance are found, the reviewer will make recommendations for corrective action(s) in the report and the following may occur:
 - a. Where agency management agrees with the recommendations, an implementation plan may requested by the reviewer within approximately thirty (30) days of the date recommendations are received.
 - b. Where agency management disagrees with recommendations, management may contact the reviewer to request an informal resolution of the issue(s).
 - (1) Where an informal resolution is reached, an implementation plan may be requested by the reviewer within approximately thirty (30) days of the date recommendations are accepted.
 - (2) Where an informal resolution is not reached, a meeting may be requested by the State EO Officer and the appropriate agency staff.
 - (3) Where no agreement is reached at this level, the negotiations may be escalated to the next, or highest, level of review.
 - c. At some point (usually 6 to 9 months) after the recommendations are implemented; a follow-up review may be scheduled to assess the progress made in resolving the identified problem areas.

Civil Rights Compliance, Equal Opportunity And Nondiscrimination Monitoring Data Analyses

The following are the routine data analyses to be performed as part of the desk review.

WIA Funded program data:

WIA Title I

- from population eligible to be served to applicant
- from applicant to eligible applicant
- from eligible applicant to participant
- completed WIA or partner services
- received supportive services

Adult and Dislocated-Worker Programs

- adult education/basic skills/literacy activities
- on-the-job training
- occupational skills training
- nontraditional training

Youth Programs

- education achievement services
- employment services
- summer youth employment opportunities

Terminations

- received follow-up services
- entered training-related employment
- entered nontraditional employment
- attained certificate/diploma/degree
- entered postsecondary/advanced training
- other exits (institutionalized/health-medical/deceased)

Earnings at program completion (structure of the analysis is to be determined)

Younger Youth

- goal attainment
- basic skills
- occupational skills
- work-readiness skills
- education
- attained diploma/GED/is attending school
- placement
(structure of the analysis is to be determined)

Any of the preceding analyses may be applied to specific groups, where appropriate, to include:

- migrant and seasonal farm workers
 - veterans
 - individuals with disabilities
 - TANF recipients
 - welfare-to-work program participants
 - Job Corps participants
- and to programs for Native Americans, where appropriate.

TANF funded program data:

- from population eligible to be served to applicant
- from applicant to eligible applicant
- from eligible applicant to participant

Civil Rights Compliance, Equal Opportunity And Nondiscrimination
Monitoring

Entrance Conference

Date of Visit:

Reviewer(s):

Service Provider:

Name:

Address:

Phone:

Representatives

Director/Administrator:

Local EO Officer/Manager:

Items Covered in Initial Meeting	Programs Reviewed
<input type="checkbox"/> Introduction <input type="checkbox"/> Reason for the review <input type="checkbox"/> Purpose of the review <input type="checkbox"/> Elements of the Review <input type="checkbox"/> File Review <input type="checkbox"/> Walk-through <input type="checkbox"/> Employee Interview(s) <input type="checkbox"/> Client Interview(s) <input type="checkbox"/> Other: _____ <input type="checkbox"/> Exit Meeting/Conference to be held	<input type="checkbox"/> WIA <input type="checkbox"/> W-2 <input type="checkbox"/> Child Support <input type="checkbox"/> Child Care <input type="checkbox"/> Food Share Employment and Training <input type="checkbox"/> Refugee Other _____

Document questions and responses in this space:

Civil Rights Compliance, Equal Opportunity And Nondiscrimination Monitoring Monitoring Review Instrument

Element 1: Designation of EO Officer

1. Name of Local EO Officer:

2. To whom does the EO Officer report? Please provide a copy of the job description for the EO Officer.

3. Describe any non-EO related job functions that may create a conflict of interest or the appearance of a conflict of interest.

4. How is the EO Officer's identity made known to participants and service providers?

5. On what internal and external communications concerning the recipient's nondiscrimination and equal opportunity programs does the EO Officer's identity and contact information appear? Please provide examples.

6. Does the EO Officer:

Yes	No	
		Process complaints?
		Review participant reports for equity of service?
		Conduct on-site visits to service providers and contractors or review monitoring reports to ensure that the recipient and its contractors are not violating their nondiscrimination obligations?
		Provide EO training to staff and contractors?
		Review written policies to make sure they are nondiscriminatory?
		Develop and publish discrimination complaint procedures?

7. What equal opportunity training has been provided to staff? (Please specify dates and locations – may attach a log)

8. What training has been provided to recipient's service providers and contractors? (Please be specific – may attach a log)

9. Has the EO attended the "CRC in Service Delivery" training (either in person or the web cast) or other professional training has the Local EO Officer attended? Identify the training received and dates:

10. Describe staffing support for the EO Officer, if any.

FSET Only:

11. Annual Staff Training Requirement for Food Share Employment and Training (FSET) Program

The Requirement: USDA-FNS funded agencies will provide annual CRC training to the agency heads, administrators, mid-level managers and front-line staff. New employees, managers are informed of the AA/CRC policies as part of their orientation program and in-service training. New staff receive training on the policies, along with instructions on the laws and regulations concerning equal opportunity in employment and service delivery. Copies of the laws and regulations are made available to staff.

Has this requirement been met? _____YES _____NO

Do you need technical assistance in this element? If so, explain;

Element 2: Notice and Communication

12. Where are the posters displayed and which versions are displayed – English (E), Spanish (S) Hmong (H) or all? (identify additional languages required based on the desk review of LEP data)

Required Posters:	Language	Number	Location
Equal Opportunity Policy			
How to File an Employment or Service Delivery Discrimination Complaint (DHHS)			
Limited English Proficiency Policy			
Complaint Information (WIA only)			
Your Rights			
And Justice for All USDA Poster			
"I Speak Card" (Publication)			
Job Center Complaint Coordinator Poster (WIA)			

13. Notice of Equal Opportunity and Nondiscrimination:

- How are participants notified?
- Who provides the notice to the participant?
- Does the notice include the required language (WIA has specific requirement)?

(Please provide copies of any applicable documents.)

14. Are additional steps taken, beyond the required posters, to ensure continuing notice of the right to file a discrimination complaint is provided to Limited English Proficient populations in their language?

15. What equal opportunity "tagline" is included in brochures, pamphlets, flyers, and materials distributed or communicated in written, oral or electronic form to applicants, staff and the general public? (e.g., We are an equal opportunity employer/program service provider. If you need assistance to access services or material in an alternate format please contact... etc.)

(Please provide samples/examples of materials in which this is included.)

Is the "tagline" included in public announcements and broadcasts?

16. How does the recipient ensure that continuing notice of equal opportunity and nondiscrimination are provided to the following groups: (Provide examples for each group)
- Applicants, registrants, participants
 - Employees and applicants for employment
 - Other recipients of funds
 - Members of the public
 - Members of the public with disabilities, including impaired vision and hearing
 - Unions or professional organizations that hold collective bargaining or professional agreement with your organization.
17. If the recipient produces their own public information, describe how photographs and other pictorial displays include and portray positive images of women, minorities, and individuals with disabilities and persons of varying age groups engaged in a variety of workplace and skilled training capacities. (Please provide examples)
18. How has the recipient communicated the requirement not to discriminate on the basis of disability and the obligation to provide reasonable accommodations to its sub-recipients?
19. What efforts does the recipient make to ensure that communications with individuals with disabilities are equally as effective as communications with other non-disabled individuals?
20. In all communications indicating that the Recipient/Agency may be contacted by telephone, is the telephone number for the TDD/TTY or relay service provided?
21. How is the Equal Opportunity Notice provided in alternate formats for individuals with visual impairments?

Do you need technical assistance in this element? If so, please explain:

Element 3: Assurance

Do contracts contain the approved equal opportunity assurance language appropriate to

WIA Programs:

“...discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in a WIA Title I financially assisted program or activity, is prohibited. “ (29 Code of Federal Regulations (CFR), Part 37.1 Purpose

TANF and other State and Federally funded Programs:

“...no person in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.” (45 CFR, Part 80.1 Purpose

Please provide an example of a sub-contract Equal Opportunity Assurance section.

22. Is the sub-contractor or service provider aware of the EO assurances requirements in the contract or agreement? (Provide an example of how this is accomplished.)

23. What equal opportunity and nondiscrimination policies are in place for employees? Please provide a copy.

Do you need technical assistance in this element? If so, please explain:

Element 4: Universal Access

24. Describe the efforts to analyze the demographic profile of the population to be served in the service area?
25. What steps has the recipient taken to ensure services and other information is provided to Limited English Proficient persons?
26. In what languages is information routinely provided within the service area, other than English?
27. What documents have been determined “vital” and therefore translated into languages designated as meeting the LEP requirement to be translated? Please provide examples.
28. How are the required notifications provided in alternative formats for the visually impaired and hearing impaired if different from question 19?
29. How do training providers provide programmatic and architectural accessibility for individuals with disabilities? (Please provide specific examples)
30. What outreach plans, strategies, and activities have been identified for various groups (members of both sexes, various racial and ethnic groups, individuals with disabilities, individuals in differing age groups) served?
31. Do these measures include:
 - Advertising?
 - Notices to schools and community service groups?
 - Consultation with community service groups?

Do you need technical assistance in this element? If so, please explain:

Element 5: Compliance with Section 504 of the Rehabilitation Act of 1973 & the American with Disabilities Act of 1990

504 and the ADA require federal assistance recipients to ensure that their programs, policies, facilities, and employment practices are accessible to and do not discriminate against individuals with disabilities. The method institutionalized for determining compliance with this requirement is the periodic self-assessment survey.

For WIA programs: The One Stop Job Center System was comprehensively assessed in 2004 and reports were issued to each Workforce Development Area with recommendations for improvements. These assessments are the baseline for measuring compliance under the DOL's Workforce Investment Act under this element.

32. Did the Local Workforce Investment Area receive the report from 2004 Job Center Program and Physical Assessments? If yes, please indicate what was recommended and what steps the recipient took to address the recommendations. If you have reduced these actions to writing, please provide a copy.

33. Have similar Program and Facility (504/ADA) assessments been completed for service providers not located in a Job Center? If so, please explain corrective steps taken.

For TANF and other State and Federally funded programs:

The recipient will need to provide evidence that relevant self-assessments have been conducted and corrective action steps taken as appropriate.

Has a self assessment been conducted?

For recipients of either funding source: (The following questions should be considered in conjunction with any prior self assessments and any resulting actions taken.)

34. If structural changes are needed, does the recipient have a transition plan on file? If so, please provide a copy. If not, please explain when they are anticipated to be completed.

35. Are contractor and service provider sites accessible to individuals with disabilities?

- Is there at least one entrance to the building that is wheel chair accessible? If yes, does it have the international symbol for accessibility for individuals with disabilities posted? If no, where are these clients directed to go? Explain
- Do inaccessible entrances have signs indicating the location of the nearest accessible entrance? Explain.
- Are there designated restrooms with appropriate signage available for individuals with disabilities? Explain.

- Is TTY/TDD or Relay Service available? Explain
- How often are contractor's facilities monitored to ensure accessibility?

36. Describe efforts to prohibit discrimination on the basis of disability in employment practices by the recipient and its partners.

- Requiring the provision of reasonable accommodations in employment, when appropriate.
- Reviewing job qualifications to ensure that it does not use selection criteria that screen out or tend to screen out an individual with a disability on the basis of that disability unless the criteria is job related for the position in question and consistent with business necessity.
- Prohibiting pre-employment inquiries regarding disability except to ask for the individual to self-identify himself or herself as a person with a disability on a voluntary basis for reporting purposes and will be maintained confidentially.

37 thru 42: Reviewer additional questions to consider in this element:

37. How does the recipient insure that it does not aid or perpetuate discrimination by providing significant assistance to a person or recipient that discriminates on the basis of disability
38. How does the recipient insure that programs and activities are administered in the most integrated settings possible?
39. How does the recipient insure that, in determining the site or location of a facility, selections are not made that have a discriminatory effect?
40. How does the recipient insure that eligibility criteria that screen out or tend to screen out an individual with a disability or class of individuals with disabilities are not imposed unless such criteria can be shown to be necessary for the provision of the aid, benefit, service, training, program or activity being offered?
41. How does the recipient insure that an individual with a disability is not required to accept an accommodation, aid, benefit, service, training, or opportunity that the individual chooses not to accept?
42. How does the recipient insure that, employment-related training selection criteria are reviewed to ensure that they neither screen out, nor tend to screen out, individuals with a disabilities or any class of individuals with disabilities from fully and equally enjoying the training unless the criteria can be shown to be necessary for the training being offered?

43. Please describe the availability of assistive equipment for individuals with disabilities.
44. Please describe the recipient's web site in regards to its accessibility.
45. Please describe any reasonable accommodations that have been provided for applicants, participants, or employees with disabilities.

How are reasonable accommodations provided regarding the registration for, and the provision of, aid, benefits, services or training-including core and intensive training-and support services to qualified individuals with disabilities?

Describe how you meet the obligation to operate programs or activities which when viewed in their entirety, are readily accessible to qualified individuals with disabilities, through means such as: redesign of equipment; reassignment of classes or other services to accessible buildings; assignment of aids to beneficiaries; home visits; delivery of services at alternative accessible sites; alteration of existing facilities and construction of new facilities in conformance with standards for new construction; or any other method that results in making its program or activity accessible to individuals with disabilities?

Does the recipient have a written reasonable accommodation policy? If yes, please provide a copy.

46. Describe how medical condition information is maintained separate from other files and secured.

Do you need technical assistance in this element? If so, please explain:

Element 6: Data and Information Collection and Maintenance

47. Please explain EO customer demographic data collection procedures in your agency.
(race/ethnicity, sex, age, and where know, disability status)
48. Please explain how you conduct statistical/quantifiable analysis on the population being served?

- How are these data maintained under safeguards that will restrict access to authorized personnel only? Please explain.
- Are the records kept for a period of three years?
- How are these records destroyed?
- How are staff made aware that customer demographic data must be collected?
- How is the data collected by staff?

Do you need technical assistance in this element? If so, please explain:

Element 7: Monitor Sub-Recipients of funding from the Primary Recipient for Compliance

49. List the EO Officer monitoring visits conducted.

How often are the on-site monitoring visits conducted?

Please provide a record and/or summary report of the EO monitoring visits (dates, locations, entities and findings) since your last Monitoring review.

Do you need technical assistance in this element? If so, please explain:

Element 8: Complaint Processing Procedures

50. What discrimination complaint policies and procedures are used in the recipient agency?
Please provide copies.

51. Explain how customers and employees obtain a copy of the discrimination complaint policy and procedures and/or discrimination complaint form?

52. Does the discrimination complaint log for formal discrimination complaints include the following:

- Name and address
- Basis of complaint
- Brief description of complaint
- Date filed
- Disposition

Please provide a copy of the discrimination complaint log for review.

53. Please list any formal complaints that have been filed with the recipient since the last EO monitoring visit.

Please respond to the following questions concerning each complaint:

- Was the complaint filed within 180 days?
- Was the complainant provided a written notification of receipt of the complaint within 10 days?
- Was the complainant provided a written statement of each of the issues raised in the complaint and whether you would accept or reject each issue?
- Was the complainant sent a written notice of lack of jurisdiction when the recipient determined that it did not have jurisdiction over a complaint?
- Was the complainant notified that they have the right to representation in the complaint process?
- Was the complainant offered Alternative Dispute Resolution as an effort to resolve the complaint?
- Was the complainant provided a written Notice of Final Action within 90 days of the date the complaint was filed?

- Did the Notice of Final Action contain your decision on each issue and an explanation of the reason underlying the decision?
- Did the Notice of Final Action inform the complainant that he/she has a right to file a complaint with CRC within 30 days of the date in which the Notice of Final Action is issued if he/she is dissatisfied with your final action on the complaint?
- Has the State EO Officer been advised of the complaint?

54. Are the discrimination complaint records kept for a period of three years?

55. How is the identity of the complainant or any individual kept who furnishes information relating to, or assisting in, an investigation confidential to the extent possible, consistent with a fair determination of the issues?

56. How is an individual who filed a complaint, opposed a practice prohibited by the nondiscrimination and equal opportunity provisions, or assisted or participated in any manner in an investigation protected from discharge, intimidation, retaliation, threat or coercion?

57. What is the recipient's policy (attach) for handling discrimination complaints from contractors regarding participants?

Food Share Employment and Training only:

58. Were any complaints related to FSET alleging age or religious discrimination referred to OCR as required? _____YES _____NO

The Requirement: Complaints filed involving USDA-FNS recipients and sub-recipients administering programs, services and activities where the complainant is claiming age discrimination must be directly filed with the FNS Regional Office of Civil Rights in Chicago within 5 working days. The FNS Regional Office of Civil Rights (OCR) must refer all Age Discrimination complaints to the Federal Mediation and Conciliation Services (FMCS) within 10 days of initial receipt by the State agency, local agency, or other subrecipient.

Do you need technical assistance in this element? If so, please explain:

Element 9: Corrective Actions/Sanctions

59. What are the recipient's procedures for obtaining voluntary compliance when equal opportunity violations are found?

What is the follow up policy for violations?

60. What, if any, corrective actions/sanctions were taken against contractors since the last monitoring review?

Do you need technical assistance in this element? If so, please explain:

<p>Review Completed By (Signature) and Date:</p>

Civil Rights Compliance, Equal Opportunity And Nondiscrimination Monitoring Review Instrument

OPTIONAL (For use if other related information is not available)

Program Recruitment and Assessment

(Recipient): _____

Location: _____

Recruitment/Outreach service provider: _____

Program(s): _____

Person(s) interviewed:

Name: _____ Position: _____

Name: _____ Position: _____

Name: _____ Position: _____

Interviewer: _____ Date: _____

(Questions with an asterisk (*) are related to WIA funded programs Only)

Program Recruitment

- 1 Describe your recruitment (marketing and outreach) process (e.g., school visits, media ads, etc.).
- 2 Who is responsible for recruitment, by name and job title?
- 3 How is the eligible population determined (for the program(s) listed above)?

- 4 What media are used to recruit applicants? What specific resources are used to recruit racial/ethnic minority applicants, female applicants, veterans and applicants with disabilities?
- 5 *When does a “customer” officially become an “applicant”?
- 6 *How often is orientation offered to potential applicants? What is the “typical” number who attend?
- 7 *Who is responsible for conducting the orientation (by name and title)?
- 8 *What is the format of the orientation? [Lecture only? Video? Question and answer? (etc)]
- 9 *How is it determined whether a customer will need an accommodation (because of a disability) in order to attend orientation or to apply for services?
- 10 *What attendance records are kept for each orientation session?
- 11 *Are there follow-up contacts with individuals who attend orientation but do not complete an application?
- 12 *Are there occupations that are in high demand in your region? (If so, name them)

Program Assessment

13. Describe the assessment process.
14. Are there locally developed forms (that is, forms developed within the region) that are used in the process? (Describe)

15. Who evaluates the information provided on the application for services?
16. * Are all applicants tested? If not, who or what determines which applicants are tested?
17. * How are the tests scored? Is there a cut-off score to indicate “failed” or “passed”?
18. * What tests, by name, are administered, and have they been validated?
19. * Who administers the tests, and where?
20. * Who scores the tests, and interprets the results?
21. * How is consistency of interpretation determined?
22. Do test scores determine eligibility and placement in all programs or just in certain programs? (Name, if appropriate)
23. Are service providers, other than assessment staff involved in assessment, selection, and placement of individuals into programs? (If so, describe)
24. * What happens to someone who is not accepted into a particular program of his or her choosing?
25. Are individuals who do not qualify for federal assisted programs informed of possible alternatives? (If so, describe)
26. Are individuals who are not selected for federal assisted programs tracked? If so, is any data retained on those individuals, and where is the information kept?

27. What accommodations are available for the applicant with disabilities or impairments during application and assessment, and are readers available to visually impaired persons who do not use Braille?
28. * Discuss the percentage of women and racial/ethnic minority applicants and participants who go into nontraditional jobs. How are applicants informed of opportunities in nontraditional jobs?

***Document templates for use in desk
review,
client and staff interviews and the exit
interview follow this page***

CURRENT STAFFING DATA

Site: _____

[illegible]

145

**Civil Rights Compliance, Equal Opportunity
And Nondiscrimination Monitoring**
OPTIONAL

Participant File Review Worksheet

Date of File Review:

RECIPIENT/One-Stop/Service Provider:	Reviewer:
---	------------------

#	Participant's Name	Last Four	Program	Gender	Race/Ethnicity	LEP	Disability	Medical Condition Information	Inappropriate Comments	Notice
1										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										
19										
20										
21										
22										
23										
24										

KEY

Last Four: Last four digits of the Social Security number

Disability: Is the participant registered as a person with a disability on the registration sheet?

Medical Condition Information: Is there any medical condition information in the file that could be construed as revealing a disability or relating to a disability? This includes information in case notes.

Inappropriate Comments: Subjective or Inappropriate Comments?

Notice: Is a signed copy of the "Equal Opportunity is the Law" notice (29 CFR 37.30) retained in the participant file?

REMARKS

[illegible]

**Civil Rights Compliance, Equal Opportunity
And Nondiscrimination Monitoring**

**Client Interview
(For use in TANF Reviews)**

Interviews should be conducted in a location that ensures privacy.

Sample introduction: *"I am conducting a monitoring review of this office. (Provide a Business card.) I would like to ask you a few questions regarding your experiences with this office. Your participation is completely voluntary. Neither your participation nor your responses will in any way affect the services you receive from this office. Absolutely none of the information will be recorded in any files pertaining to you. Are you willing to participate in this interview or do you have any questions?"*

Interviewer:

Location:

Date:

Client City of Residence:

Form below is to be provided to the client for them to fill out and return to the reviewer

"The following is strictly voluntary and will be treated confidentially. It will not affect your status in receiving benefits or services."

Would you identify the following (this information is voluntary):

Gender:	<input type="checkbox"/> Male	<input type="checkbox"/> Female
Ethnic Origin:	<input type="checkbox"/> Hispanic or Latino	<input type="checkbox"/> Not Hispanic or Latino
Race (Check all that apply):	<input type="checkbox"/> American Indian or Alaskan Native	
	<input type="checkbox"/> Asian	
	<input type="checkbox"/> Black or African American	
	<input type="checkbox"/> Native Hawaiian or Other Pacific Islander	
	<input type="checkbox"/> White	
Are you an individual with a disability?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

1. Please describe the frequency of your visits or contacts here:
2. Do you feel that this office is accessible to all, regardless of their:
 - Race/Color/Ethnicity?
 - Sex or Gender?
 - Disability?
 - Religion?
 - National Origin?
 - Age?
 - Limited ability to speak or understand English?
 - Citizenship?
 - Political Affiliation or Belief?
3. What recommendations, if any, do you have in order to assist the office in providing universal access?
4. What is your opinion of the quality of service provided here?
5. Did anyone inform you of your equal opportunity/nondiscrimination rights as a program applicant or participant? (For example, did anyone inform you of what to do if you believe you were discriminated against based on your race, gender, age, disability, national origin, etc?)

When you registered, did you get a copy of those rights?
6. Do you have any comments, concerns, or suggestions about the program?

“Would you like to be contacted by us regarding your concerns?”

If so:

Name:

Address:

City, State, Zip

Phone:

Thank you

Summary - Interview results from Interviews with Clients

- Number of clients interviewed:
- Race/Gender of Clients:
- Overall client response regarding services:
- Overall client recommendations:

Civil Rights Compliance, Equal Opportunity And Nondiscrimination Monitoring Employee/Staff Interview

Assure the employee that his/her name will not be a part of the review record, only the nature of his/her response.

Employee's function in the office:

Interviewer:

Location:

Date:

- 1 What training have you received regarding Equal Opportunity requirements related to your work? When and where?
- 2 Does your local supervisor or manager discuss equal opportunity and equal access for clients with the staff?
- 3 What arrangements are made to provide services to limited English proficient individuals? (Identify staff and partners used to help customers)
- 4 Are you aware of languages spoken by customers in this area who are limited English proficient? What are they?
- 5 Where do you obtain the unit's policies, procedures or guidance regarding limited English proficiency?
- 6 Do you have any questions on how to serve limited English proficient individuals? If so , what are they?

What arrangements are made to provide services to the visually impaired, deaf clients, and non-ambulatory clients? (Please be specific).

7. What do you do if a person comes in with a need for an American Sign Language interpreter?
8. Do you know who to ask when you have a question about services to individuals with a disability? Please explain and be specific.
9. Are you aware of local policies and procedures regarding individuals with disabilities? Where do you find the policies, procedures or information?
10. Do you have any questions on how to serve individuals with disabilities? If so, what are they?
11. Are you involved with job orders? If so, what is your understanding of nondiscriminatory job orders?
12. What do you do if a client tells you that she feels she has been discriminated against by you or someone in your office because of her race/ethnicity, color, religion, sex, national origin, age, disability, political affiliations or belief, *(or for WIA Title I program beneficiaries, her citizenship or participation in a WIA Title I financially-assisted program)?

Do you know what her rights are? Please explain

13. What do you do if you feel you have been discriminated against because of your race/ethnicity, color, religion, sex, national origin, age, disability, political affiliation or belief, *(or for WIA Title I program beneficiaries, citizenship or participation in the WIA Title I financially assisted program)?

Do you know what your rights are? Please explain.

14. Do you have any questions or comments?

Summary - Interview results from Interviews with Staff

- Number of staff interviewed:
- Overall knowledge of rights:
- Overall understanding of illegal job orders:
- Overall understanding of access for LEP persons:
- Overall understanding of access for individuals with disabilities:

**Civil Rights Compliance, Equal Opportunity
And Nondiscrimination Monitoring**

Exit Meeting/Exit Conference

Reviewer(s):

Recipient/agency Representative(s):

Preliminary Observations and Recommendations /Findings and Required Actions

Feedback from the recipient/agency

If you have questions, please contact:

Attachment I

Complaints/Grievances and Appeals

S. COMPLAINTS/GRIEVANCES AND APPEALS.

These are the procedures DWS grantees/contractors, employees, applicants for or participants in DWD-funded programs, and other parties affected by the operations of DWD-funded programs shall use to resolve complaints/grievances and appeals regarding alleged violations of DWD grants, its related regulations, applicable Wisconsin statutes, other applicable federal or state requirements, the provisions of this document or the terms of a DWD grant agreement or contract.

1. General Requirements for processing complaints/grievances and appeals.

- a. Program and Grant Responsibilities.** DWD grantees shall establish and maintain complaint/grievance and appeal procedures that conform to DWD Grant and other applicable federal and state requirements. To be valid, systems for resolving DWD Grantee complaints/grievances must provide for due process.

(1) The elements of due process:

- (a) Notice to the parties of the specific charges and the responses of those involved;
- (b) Reasonable timing;
- (c) An impartial decision-maker;
- (d) The right of the parties to representation;
- (e) The right of each party to present evidence both in writing and through witnesses;
- (f) The right of each party to question others who present evidence; and
- (g) A decision made strictly on the recorded evidence.

(2) The grantees must:

- (a) Describe their complaint/grievance and appeal procedures in their DWD grant agreements.
- (b) Assure that their subgrantees are informed of and maintain procedures consistent with the requirements of this section.
- (c) Require that every employer who hires participants under DWD-funded programs shall maintain complaint/grievance and appeal procedures, which include the employer's terms and conditions of employment as described in WIA Title I Section 122 (h)(1) and applicable collective bargaining agreements.
- (d) Follow their own written procedures in resolving WIA Title I complaints/grievances at the local level.
- (e) Post complaint/grievance and appeal procedures in a prominent place(s) and ensure that DWD grant participants are made aware of their rights regarding complaints/grievances, appeals, and hearings.
- (f) Retain all records about complaints/grievances and appeals for a period of three years or beyond three years if the complaints/grievances and appeals are not resolved or are under audit, investigation, or litigation.

- b. Final Authority on Decisions.** The DWS administrator, on behalf of the Governor, has the final decision-making authority on complaints/grievances arising from the administration, implementation and operation under DWD grants.

- c. **Forms for Filing Complaints/Grievances.** The DWS Complaint Information Form must be used for all formal complaints/grievances filed with DWS. Local agencies may modify the form for their own use as long as they comply with basic complaint/grievance filing requirements.
- d. **Technical Assistance.** DWS shall provide technical assistance to grantees or other parties needing information on complaint/grievance procedures and related issues.
- e. **One-Stop Complaint Procedures.** DWS in conjunction with its grantees and other federal financial assistance partners has instituted a Job Center Complaint Coordination System (JCCCS) in all Wisconsin Job Centers. Each Job Center has a Complaint Coordinator. The Coordinators refer complaints, regardless of program fund source, to the appropriate entity within or outside of the Job Center.

2. Complaint/Grievance Preparation.

- a. **Written and Within One Year.** The complainant shall file a written complaint/grievance within one year after the alleged violation took place.
- b. **Addressed to Respondent.** Complaints/grievances should be addressed to the appropriate respondent agency.
- c. **Accurate and Complete.** A complaint/grievance must be sufficiently accurate and complete to be evaluated on its own. It is suggested that formal complaints/grievances be notarized.
- d. **Establishment of Filing Date.** The filing date of a complaint/grievance is established when a complainant submits a written complaint/grievance that provides:
 - (1) The full name, telephone number (if any), and address of the person(s) or organization(s) making the complaint/grievance;
 - (2) The full name and address of the respondent against whom the complaint/grievance is made;
 - (3) A clear and concise statement of the facts, including pertinent dates constituting the alleged violation;
 - (4) The provisions of the DWD grant, the regulations, or other applicable agreements believed to have been violated;
 - (5) A statement disclosing whether the complaint/grievance has been cross-filed with any other jurisdiction and whether these other proceedings have commenced or been concluded, including dates, authorities, and other pertinent information.
- e. **Response by recipient grantee.** The grantee shall acknowledge receipt of a complaint/grievance in writing within five (5) working days. Where possible the file date should be included in the response.

3. Requirements for Complaints/Grievances Alleging Discrimination.

- a. Section 188 of Title I of WIA prohibits discrimination on the basis of age, disability, sex, or on the basis of race, color, or national origin, political affiliation or belief, status as a program participant, or against beneficiaries on the basis of citizenship/status as a lawfully admitted immigrant authorized to work in the United States. Complaints/grievances alleging a violation of WIA Title I s.188 and 29 CFR, Part 37.70 – 37.114, regarding discrimination will be processed as follows:
 - (1) The complaint may be filed either with the United States Department of Labor (DOL) Director of the Civil Rights Center (Director/CRC – the cognizant federal agency for discrimination complaints) or DWS.

- (2) The Director/CRC, for good cause shown, may extend the filing time deadline. This time period for filing is for the administrative convenience of the Directorate and does not create a defense for the respondent.
 - (3) Any person who elects to file a complaint with DWS shall allow DWS 90 calendar days to process the complaint.
 - (4) DWS has adopted procedures which allow any party to a discrimination complainant to request Alternative Dispute Resolution (ADR) or mediation of their complaint. ADR allows disputes to be resolved in a less adversarial manner and is totally voluntary. The complainant may file a complaint with the Director/CRC within 30 days should ADR fail to provide a satisfactory resolution of the complaint. The Equal Rights Division of DWD will provide ADR or mediation for parties requesting this method of resolving discrimination complaints.
 - (5) If, by the end of 90 calendar days, DWD has not completed processing the complaint, has failed to notify the complainant of the resolution, or has offered a resolution not satisfactory to the complainant, including ADR, the complainant may, after the 90 calendar days have passed, file a complaint with the Director/CRC by completing and submitting CRC's Complaint Information and Privacy Act Consent Forms. The complaint must be filed no later than 30 calendar days after DWD has issued a final decision or 90 days have passed. In any event, the complaint must be filed with CRC no more than 120 days after the complaint was initially filed.
 - (6) The Director/CRC shall, at the conclusion of the investigation, advise the complainant and respondent whether there is reasonable cause to believe that a violation of the nondiscrimination and equal opportunity provisions of a DWD Grant or 29 CFR, Part 37, has occurred.
 - (7) A complainant has 180 days to file a discrimination complaint.
- b. Discrimination Based on State Fair Employment Statutes.**
 Complaints/grievances alleging a violation of the State of Wisconsin's Fair Employment Statute, 111.31-111.395, Stats., regarding discrimination must be filed with the DWD-Equal Rights Division (ERD) within 300 days after the alleged discrimination took place. Complaints/grievances filed with the DOL-CRC may be cross-filed with the state DWD-ERD. The Fair Employment Statute extends protection to classes not covered under federal law, such as arrest/conviction record, marital status, sexual orientation, military reserve status, and use of lawful products. Complaints/grievances appealed to the Equal Rights Division must be filed using the ERD Discrimination Complaint Form. A link to this form follows:
<http://www.dwd.state.wi.us/er/pdfs/ERD-4206a-F.pdf>

4. Requirements for Complaints/Grievances Alleging Noncriminal Violations other than Discrimination.

- a. Grantee as Respondent.** When a DWD grantee is a respondent to complaints/grievances about the administration, implementation, and operation of its DWD-funded employment and training programs, the following procedures must be used:
- (1) The complainant shall file a written complaint/grievance within one year after the alleged violation took place.
 - (2) The grantee shall review the complaint/grievance to determine if it was filed within the one-year time limit and if it falls within the jurisdiction of the DWD Grantee and WAA. If the criteria are not met, the grantee shall provide the

complainant with written notice of the rejection of the complaint/grievance and the reasons for that rejection. If the criteria are met, the grantee shall provide the complainant with written notice of the acceptance. The filing date shall be included in the notice.

- (3) After accepting the complaint/grievance, the grantee shall:
 - (a) Conduct a hearing within 30 calendar days of the filing date; and
 - (b) Issue a decision to the complainant within 60 calendar days of the filing date.
- (4) Format for a written decision.
 - (a) Summary Statement that identifies issue(s) being contested and which caused the hearing to be called. Include citation of law(s), rule(s), regulation(s), policy(ies), and agreements alleged to have been violated.
 - (b) Findings of Facts, which enumerates items the hearing examiner accepts as facts based upon demonstration of support (documentation) from complainant's and respondent's presentation of facts and opinions.
 - (c) Conclusion is a brief summary of the facts, which affirm or deny assertions made by parties at the hearing.
 - (d) Decision should be based on the conclusion(s) and provide a remedy for final resolution.
 - (e) Appeal rights must be included in the written decision. This statement of appeal rights shall include how, where, and how much time the aggrieved party has to appeal the decision.
- (5) After receiving an adverse decision or no decision on a complaint/grievance within 60 calendar days, the complainant may file an appeal requesting a state level independent review. This appeal must be filed with DWD within the following time limitations:
 - (a) The complainant must file the appeal within 10 calendar days after the complainant received the decision; or
 - (b) If the complainant did not receive a decision, the complainant must file the appeal within 15 calendar days after the decision was due.
- (6) After accepting a complaint/grievance that has been appealed from the grantee level requesting a state level review, the DWS administrator, on behalf of the Governor, shall review the case and issue a final decision within 30 calendar days after the appeal was filed.
- (7) Appeal. A complaint alleging that DWD, on behalf of the Governor, has not issued a decision within 60 days after a complaint is filed or the party to such decision receives an adverse decision may appeal these issues to the Secretary of Labor. The Secretary shall make a final determination no later than 120 days after receiving such an appeal.

b. DWD as Respondent. When DWD is a respondent to complaints/grievances about the administration, implementation, and operation of its DWD-funded employment and training programs, the following procedures shall be used.

- (1) The complainant must file a written complaint/grievance within one year after the alleged violation took place. For a complaint or grievance involving audit resolution, an appeal must be filed between 15 and 30 days after the issuance of the determination letter, as detailed in the letter.
- (2) DWD must review the complaint/grievance to determine if it was filed within the one-year time limit and if it falls within DWD's jurisdiction. If the criteria are not met, DWD shall provide the complainant with written notice of the rejection of the complaint/grievance and the reasons for that rejection. If the criteria are met,

DWD shall provide the complainant with written notice of the acceptance of the complaint/grievance.

- (3) After accepting the complaint/grievance, DWD shall:
 - (a) Appoint a hearing examiner;
 - (b) Conduct a hearing within 30 calendar days of the filing date; and
 - (c) Issue a decision to the complainant within 60 calendar days of the filing date.
- (4) After receiving an adverse decision or no decision on a complaint/grievance within 60 calendar days, the complainant may file an appeal requesting a state level independent review. This appeal must be filed with DWD:
 - (a) The complainant must file the appeal within 10 calendar days after the complainant received the decision; or
 - (b) If the complainant did not receive a decision, the complainant must file the appeal within 15 calendar days after the decision was due.
- (5) After accepting the appeal, DWD shall designate a review officer to conduct the state level independent review.
- (6) After reviewing the case file and (if needed) gathering additional information, the Independent Review Officer shall issue a recommended decision to the DWS administrator within 30 calendar days after the appeal was filed. The DWS administrator may accept, reject, or modify the Independent Review Officer's recommended decision.
- (7) The DWS administrator must, on behalf of the Governor, issue a final decision within 30 calendar days after accepting the request for a state level independent review.

c. Employer/Work-training Provider as Respondent. When an employer or work-training provider acting under agreement with a DWD grantee/contractor is a respondent to complaints/grievances about the administration, implementation, and operation of DWD-funded employment and training programs, including complaints of unlawful employee displacement by a DWD program participant, the following procedures must be used:

- (1) The complainant shall file a written complaint/grievance within one year after the alleged violation took place.
- (2) The grantee or contracting agency shall review the complaint/grievance to determine if it was filed within the one-year time limit, if it falls within the jurisdiction of the DWD grantee/contractor, and if it meets grievance/complaint criteria under WIA or TANF/W-2. If the criteria are not met, the grantee shall provide the complainant with written notice of the rejection of the complaint/grievance and the reasons for that rejection. If the criteria are met, the grantee/contractor shall provide the complainant with written notice of the acceptance. The filing date shall be included in the notice.
- (3) After accepting the complaint/grievance, the DWD grantee/contractor shall contact the respondent, investigate the complaint, and attempt to reach an informal resolution.
- (4) If an informal resolution cannot be reached, the grantee/contractor shall:
 - (a) Conduct a hearing within 30 calendar days of the filing date.
 - (b) Issue a decision to both the complainant and respondent within 60 calendar days of the filing date.
- (5) Format for written decision.
 - (a) Summary Statement that identifies issue(s) being contested and which caused the hearing to be called. Include citation of law(s), rule(s),

- regulation(s), policy(ies), and agreements alleged to have been violated.
 - (b) Findings of Facts, which enumerates items the hearing examiner accepts as facts based upon demonstration of support (documentation) from complainant's and respondent's presentation of facts and opinions.
 - (c) Conclusion is a brief summary of the facts, which affirm or deny assertions made by parties at the hearing.
 - (d) Decision should be based on the conclusion(s) and provide a remedy for final resolution.
 - (e) Appeal rights must be included in the written decision. This statement of appeal rights shall include how, where, and how much time the aggrieved party has to appeal the decision.
- (6) After receiving an adverse decision or no decision on a complaint/grievance within thirty calendar days, either the complainant or the respondent (or both) may file an appeal requesting a state-level independent review. This appeal must be filed with DWD within the following time limitations:
- (a) The complainant and/or respondent must file the appeal within 10 calendar days after they received the decision; or
 - (b) If the complainant and/or respondent did not receive a decision, they must file the appeal within 15 calendar days after the decision was due.

5. Requirements for Complaints/Grievances Alleging Incidents of Fraud and Abuse Violations of DWD Grants

- a. Notification of Requirements.** All WDAs and other organizations receiving DWD funds shall respectively notify the LEO, WDB members, employees, subrecipients, all DWD grant participants, and the general public of the contents of this subsection.
- b. Nationwide System for Reporting Incidents.** The DOL-ETA, in conjunction with the Office of Inspector General (OIG) has established a nationwide system to report any suspected or actual incidents of fraud and abuse. Under this system, the following procedures will apply to DWD grant recipients.
 - (1) Individuals who become aware of any allegation or complaint/grievance about possible fraud, misfeasance, nonfeasance, or malfeasance, misapplication of funds, gross mismanagement, and employee or participant misconduct involving DWD grant programs or operations should report that information as follows:
 - (a) Staff of WDAs or statewide grantees shall within one working day, file an Incident Report using the DWD Grant Fraud and Abuse Incident Report form and submit it to DWD according to procedures on the back of the form.
 - (b) Staff of program operators other than WDAs or statewide grantees or members of the public may report suspected incidents of fraud and abuse either to the local WDA Administrative Entity or to DWD.
 - (c) It is not the intent of the DOL or DWD to limit use of the Incident Report to elicit information only after an act or allegation has already been determined legally prosecutable. On the contrary, any act that raises questions concerning possible illegal expenditures or other unlawful activity should be reported immediately.
 - (2) Complainants who fear that their positions will be compromised if they submit information through the WDA/DWD reporting system may send an Incident Report directly to the OIG, P.O. Box 1924, Washington, D.C., 20013, or

telephone the OIG's hotline that is maintained for public use by individuals who want to report a suspected wrongdoing. The toll free number is (800) 424-5409. The OIG is required to respond to hotline referrals within 30 days.

- (3) The identity of individuals who provide information will not be disclosed unless they consent or the OIG determines that disclosure is unavoidable during the course of an investigation. The DOL prohibits reprisal against any employee who discloses information about wrongdoing or makes a valid complaint/grievance. Wisconsin's "Whistle Blower Law" provides similar protection for most state employees (230.80-230.89, Stats. & 895.65, Stats.)

c. DWD Reports to DOL. DWD must submit a DOL Incident Report within five working days to the DOL regional administrator, who must immediately refer it to the Regional Inspector General for Investigation for disposition.

d. Follow-up on Reports. Any DWD grantee that has reported an incident of alleged fraud and abuse shall follow up on these cases and work with DWD, appropriate governmental agencies, and, where necessary, law enforcement agencies, such as the district attorney and the Federal Bureau of Investigation, during the investigation and resolution of the case. For any **reported incident of fraud and abuse, the affected grantee shall do the following:**

- (1) Investigate the matter in question, have it investigated by appropriate authorities, or if requested, assist with official investigations.
- (2) During the resolution of the allegations, ensure that necessary documents are made available, that witnesses and other parties involved in the incident are contacted, that records are maintained, and that the investigatory process is proceeding smoothly.
- (3) If the investigation results in disallowed costs, follow the local debt collection process to recover the funds.
- (4) Once a fraud report has been transmitted to DWD, interim reports must be submitted when the status of an investigation changes or the grantee is aware of material changes in the methods of resolving the incident. Once an incident has been resolved, a final report is required to close out the case.

e. DWD Assistance. On behalf of the Governor, DWD is responsible for overseeing the integrity of DWD grant programs in the state and providing assistance to grantees in the resolution of cases involving allegations of fraud and abuse. DWD will assist in the investigation and resolution of cases as appropriate, monitor progress and prepare applicable reports.

6. DWD Hearing Process. DWD will use the following procedures to conduct hearings when it is the respondent in complaints/grievances. Grantees may use these procedures or follow their own procedures if based on the elements of due process previously listed.

a. Hearing Request and Response. The complainant may request a hearing by submitting a written request to DWD. DWD will schedule the hearing within 30 days after the complaint/grievance filing date and provide written notice to both parties, including the date, time, and place; issues to be decided; and relevant background material.

b. Open to Public. The hearing is informal and is open to the public.

c. Hearing Provisions. The complainant and the respondent should both attend the hearing. During and prior to the hearing, DWD will apply the following rules:

- (1) Complainants may amend the complaint/grievance at any time prior to the hearing.
- (2) Complainants may withdraw the request for a hearing in writing prior to the hearing.
- (3) Complainants or respondents may request rescheduling of the hearing for good cause within the prescribed 30-day limit.
- (4) Complainants and respondents may be represented by an attorney or other representative of their choice.
- (5) Complainants and respondents may bring witnesses and provide/submit documentary evidence.
- (6) Respondents/grantees and/or subgrantees shall produce requested records or documents relevant to the issues and kept in the ordinary course of business. Both parties may examine all evidence presented at the hearing.
- (7) Complainants and respondents may question any witnesses or parties to the hearing.

d. Hearing Examiner's Role and Hearing Provisions:

- (1) The role of the hearing examiner prior to the hearing:
 - (a) Prepare and review of the case file;
 - (b) Determine the issues involved, affected laws, regulations, or other rules;
 - (c) Formulate a set of questions for use at the informal hearing; and
 - (d) Determine limits of pre-hearing discovery to be allowed.
 - (2) The role of the hearing examiner during the hearing:
 - (a) Make a record of the hearing;
 - (b) Ensure that the hearing procedure is followed;
 - (c) Rule on motions (standard courtroom rules of procedure need not apply);
 - (d) Determine the order of witnesses, question witnesses, take testimony, and maintain order; and
 - (e) Accept evidence and/or exhibits during or after testimony and discourage lines of inquiry not relevant to the original complaint/grievance.
 - (3) The role of the hearing examiner after the hearing:
 - (a) Not discuss the case with any of the parties;
 - (b) Consider and evaluate all relevant facts, evidence and arguments; and
- (c) Formulate and transmit a written decision to all parties, including applicable appeal or civil remedies the complainant may pursue.

Attachment J

Wisconsin's Job Center Service Standards

Introduction

The Job Center Service Standards define expectations for serving customers within Job Centers across the State of Wisconsin. The One-Stop Operator is responsible for the Comprehensive Job Centers and their affiliated Access Points of Service (APS) meeting Service Standards. By June 30, 2007, all Comprehensive Job Centers that were certified by the Workforce Development Board in September 2006 will meet all Service Standards. Progress towards meeting Service Standards will be monitored by DWD starting in 2007.

The Service Standards are broadly stated to allow flexibility in regional program design and local implementation of services. The Service Standards state "what" is to be done; it is up to local groups responsible for the planning and implementation of Job Center services to decide "how" local activities will meet the Service Standards.

1. General Provisions

Wisconsin Job Centers offer a variety of service points or services to all individuals or businesses. Customers may expect that:

- a. The level of service provided will be appropriate to individual customer's needs and consistent with program requirements.
- b. Veterans and qualified spouses shall be given priority over non-veterans in the receipt of any employment, training, and placement services provided in Wisconsin Job Centers.
- c. Customers make informed choices, within available services, and are assisted in determining options for services.
- d. Services are coordinated across programs and not duplicated, to improve efficiency and service to the customer.
- e. Program information is accessible in various delivery formats to ensure understanding by the customer, e.g., oral/written translation services, interpreter services/sign language, etc.
- f. Accommodations are made for customers' special needs (physical and programmatic).
- g. Customers receive services through the Job Center system regardless of race, gender, ethnicity, age, or disability status and in accordance with any other legal protections.
- h. Customers are treated with respect.
- i. Privacy and confidentiality are provided for all customers.

2. Staff Competencies

Staff providing services through Job Centers are trained and demonstrate competence in providing consistent, high quality service to business and job seeker customers to include:

- a. Knowledge of available community resources.
- b. Knowledge of referral process to all partner programs and services as appropriate for the customer's needs.
- c. Knowledge and assistance with all Job Center tools, technologies, Internet, and computer systems.
- d. Knowledge and assistance with special needs and overcoming barriers to employment, as needed. Understands special employment needs of diverse populations.
- e. Knowledge of privacy and confidentiality requirements for all customers.
- f. Knowledge of customer service techniques including maintaining a professional relationship.

Staff working with customers will demonstrate competence by obtaining National Association of Workforce Development Professionals (NAWDP) certification or equivalent certification.

3. Job Center Effectiveness

Job Centers will assure continuous improvement, customer satisfaction and effectiveness through the following measures:

- a. All customers are served in a timely manner. Each Job Center will decide what it considers a timely manner for customers.
- b. Customer satisfaction as measured by regular local surveys.
- c. Other continuous improvement models such as Baldrige Express, ISO 9000, Six Sigma, etc.
- d. An evaluation created locally to match the standards.

4. Job Seeker Services Standard

Each Job Center provides access to:

- a. Information on education, employment and training services.
- b. Information on local services and potential eligibility, and where the services are available.
- c. Information on pre- and post-support services needed to maintain employment.
- d. Initial, comprehensive and specialized assessments as appropriate to the customers' needs and program requirements.
- e. Career planning with an emphasis on jobs in the area that provide family-supporting wages and benefits, including nontraditional occupations.
- f. Current job openings, the qualifications associated with these openings, and application instructions.
- g. Assistance with job search, including resume writing, interviewing, seeking nontraditional employment positions, using labor market information and locating the "hidden job market," career ladders, and high wage, high demand occupations.
- h. Information on the Unemployment Insurance (UI) filing and claims update processes.
- i. Financial literacy training such as the wise use of credit and financial asset building, and credit rehabilitation counseling.

5. Employer – Business Services Standard

Each Job Center provides the following services to business customers (Note: Some of these services could be for a fee):

- a. Assistance with writing job descriptions that accurately describe the position.
- b. Assistance to employers in placing job orders to effectively announce job vacancies.
- c. Assistance with recruiting qualified job applicants.
- d. Access to labor market information and analysis.
- e. Employer events such as job fairs.
- f. Assistance with planning for workforce expansion or downsizing.
- g. Information on retention and post-employment support services for employees.
- h. Information on workplace and customized training.
- i. Enhanced business services and increased outreach to employers that offer high wage, high growth jobs.

Criteria for Certifying Comprehensive Job Centers

Introduction

The Workforce Investment Act requires each Workforce Development Area to have at least one comprehensive, physical site that is a Comprehensive Job Center. Workforce Development Boards (WDBs) are responsible for certifying Comprehensive Job Centers. The following criteria for certification are intended to increase service consistency among Wisconsin Job Centers and to focus Job Centers on being more demand-driven. A Job Center must meet all criteria in order to be certified as a Comprehensive Job Center.

Criteria

1. The Comprehensive Job Center has a credentialed employment counselor who works with all job seeker customers and is scheduled on-site each week. A credentialed employment counselor must possess a Professional Counselor license issued by the Wisconsin Department of Regulation (WI DRL) and Licensing or possess a Masters degree in Counseling and be able to be licensed by the WI DRL.
2. The Comprehensive Job Center will be open non-traditional hours to meet specialized needs of employers and job seekers. The availability of this service must be listed on the Comprehensive Job Center's website (see # 12). (Non-traditional hours are before or after the regular daytime business hours.)
3. The Comprehensive Job Center must have a liaison to schools to outreach to youthful job seekers and ensure they have access to the Job Center's services.
4. The Comprehensive Job Center must address the needs of youthful job seekers (for example, setting up a youth literature rack, designating a youth PC that has more youth oriented applications on it, or having a youth area on the website).
5. The Comprehensive Job Center must have an integrated, coordinated Business Services Team. (See *WIA Local Plan Guidelines*, III - A, December 2005.)
6. The Comprehensive Job Center must have a written *Business Services Plan* for its Center and its affiliated APS which describes how the Business Services Team will provide all business services in an integrated non-duplicative manner for the area covered by the plan.
7. The Comprehensive Job Center must have a plan that ensures a trained, competent staff and participates in a staff credentialing program such as the National Association of Workforce Development Professional credential.
8. The Comprehensive Job Center is participating in a continuous improvement program such as Baldrige Express, ISO 9000, Six Sigma, or some other WDB-approved program.
9. Each Job Comprehensive Center will have exterior signage using the "Wisconsin Job Center" logo. This logo will be located above and larger than other signage displayed. Interior signage ensures that all customers are able to use the Comprehensive Job Center effectively and includes, at a minimum, alternate language signage appropriate to customer demographics, required posters, and room locations and directions.
10. WIA Title 1, WIA Title III (Wagner-Peyser/Job Service), and WIA Title IV (DVR) must have staff physically housed and delivering services from the Comprehensive Job Center 100% of

the time the center is open and **at least four other** mandatory partner programs (listed below) have staff physically housed at and delivering services from the Center at least 50% of the time the center is open.

WIA Mandatory One-Stop Service Delivery Partners:

- WIA activities for Adults, Youth & Dislocated Workers (WIA Title I)
- Adult Education and Family Literacy (WIA Title II)
- Job Service - Labor Exchange such as Job Net (Wagner-Peyser WIA Title III)
- Vocational Rehabilitation (WIA Title IV)
- Welfare-to-Work
- Temporary Assistance to Needy Families/WI W-2 (Added by the Governor)
- Food Stamp E & T and Food Stamp Workfare
- Senior Community Service Employment Program- Older Americans Act
- Carl D. Perkins Vocational and Applied Technology Education
- Trade Adjustment Assistance (and NAFTA-TAA)
- Veterans E & T Services & local veteran's outreach programs
- Community Services Block Grants
- Housing and Urban Development E & T Activities
- Unemployment Insurance
- W-2 Employment and Training Services

Representatives from national programs are **mandatory if present in the WDA:**

- Native American Programs
- Migrant and Seasonal Farm Worker Programs
- Job Corps
- Youth Opportunity Grants
- Veterans Workforce Investment Program
- Housing and Urban Development E & T Activities
- Unemployment Insurance
- W-2 Employment and Training Services

11. The Comprehensive Job Center has a system in place to evaluate its effectiveness in providing services to job seekers and employers and makes that information available to the public.
12. The Comprehensive Job Center maintains an up-to-date website that includes services, events, contact information, hours of service and links to JobNet, JobNet Business, and WorkNET.
13. The Comprehensive Job Center must provide the following:
 - a. List job orders and make connections between job seekers and employers
 - b. Provide information about available job training and make referrals as needed.
 - c. Provide customer access to all other required WIA partner programs.
 - d. The Center ensures veterans' priority across all services and programs
 - e. The Center provides regularly scheduled financial literacy education and assistance, information about and referral to credit rehabilitation counseling
 - f. Eligibility determination: Process to determine whether an individual is eligible to receive assistance.
 - g. Other Eligibility: Assistance in establishing eligibility for welfare-to-work activities

authorized under section 403(a)(5) of the Social Security Act (as added by section 5001 of the Balanced Budget Act of 1997) available in the local area; and programs of financial aid assistance for training and education programs that are not funded under the WIA and are available in the local area.

- h. Outreach, intake: Outreach, intake (which may include worker profiling), and orientation to the information and other services available through the Job Center system.
 - i. Assessment: Initial assessment of occupational and soft skill levels, aptitudes, abilities, and supportive service needs.
 - j. Job Search: Job search and placement assistance, and where appropriate, career counseling;
 - k. Labor Market Information: Provision of employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including - job vacancy listings in such labor market areas; information on job skills necessary to obtain the jobs, and information relating to local occupations in demand and the earnings and skill requirements for such occupations; information about targeted employers is available to job seekers.
 - l. Provider Performance: Provide performance information and program cost information on eligible providers of training services, youth activities, adult education, postsecondary vocational education activities and vocational education activities available to school dropouts, and providers of vocational rehabilitation program activities.
 - m. Local Area Performance: Provide information regarding how the local area is performing on the local performance measures and any additional performance information with respect to the one-stop delivery system in the local area.
 - n. Support Services: Provide accurate information relating to the availability of supportive services, including child care and transportation, available in the local area, and referral to such services, as appropriate.
 - o. UI Claims: Provide information regarding filing claims for unemployment compensation.
 - p. Follow Up: Follow-up services (including counseling) for WIA participants who are placed in unsubsidized employment, for not *less than 12 months after the first day of employment*.
 - q. Business Services: All job orders must be listed on JobNet; offer pre-screening for targeted employers based on a posted job order
14. The site meets ADA physical and program accessibility requirements.
15. The Resource Room/customer service areas of the Center are staffed all hours the Center is open. A Job Center staff is dedicated to the Resource Room. That is, persons who are properly trained in this function and whose primary duty is to provide Resource Room services staff the room.
16. Provide equal access to all services and programs (including resource room materials and services) for all customers, including persons with disabilities and limited English-speaking persons.
17. The Comprehensive Job Center has a *Cost Contribution and Staffing Plan* that identifies how each partner will participate in the support of the Center. (See Attachments E and M)
18. There is evidence the Comprehensive Job Center has a positive relationship or partnership with local media.

19. There is evidence the Comprehensive Job Center has a positive partnership with faith and community based organizations, and business organizations.
20. The Comprehensive Job Center has an *Memorandum of Understanding* (MOU) with all partners that clearly delineates roles and responsibilities in the service delivery system.

Attachment K

DEPARTMENT OF WORKFORCE
DEVELOPMENT
DIVISION OF WORKFORCE SOLUTIONS
ADMINISTRATOR'S MEMO SERIES

____ ACTION
____ NOTICE 06-11

ISSUE DATE: 07/07/2006
DISPOSAL DATE: Ongoing

*PROGRAM CATEGORIES:

__ AS __ FM __ ML __ TR
__ CC __ FL __ NA __ W-2
__ CS __ IT __ RA X WIA
__ CF __ JC __ TC
__ CR __ LM __ TA

To: Workforce Development Board (WDB) Directors

From: Bill Clingan /s/
Division Administrator

RE: Workforce Investment Act (WIA) 35% Expenditure Requirement for Training leading to High Wage Jobs

PURPOSE:

To announce how the 35% expenditure requirement for training leading to high wage jobs requirement for the WIA Program will be implemented.

BACKGROUND

Nationwide, local workforce boards used an estimated 40% of the WIA funds they had available in Program Year (PY) 2003 to obtain training services for WIA customers. An informal survey of Wisconsin's WDBs put that figure in the range of 12-54%.

Training is a vital component to preparing Wisconsin's workforce for current and future jobs. The United States Department of Labor has also been emphasizing the need to focus WIA Title 1B funds on training. In recognition of this, the Department began a dialogue with WDB Directors and others regarding the importance of training and the need to make a greater effort towards moving people being served through our Job Center System into better jobs than we have in the past. The 2005-2007 WIA State Plan submitted to the Department of Labor in May of 2005 reflects this commitment.

With the loss of over 90,000 manufacturing jobs in the state in the past few years, many of which were unskilled, training and re-training for the workers who lost their jobs is essential. To ensure that critical resources are being focused on preparing more people for higher wage jobs, and recognizing the strong connection of training to a "ready" workforce, the Department has set a goal of spending 35% of formula allocated WIA funds for the Adult and local Dislocated Worker and Special Response programs, less the 10% for administration, in PY06 for training and training supports leading to high wage jobs. This requirement is included in the WIA Local Plan Guidelines Part 2 which were issued by the Department in December 2005.

DWS-13961 (R. 07/2004)

*** PROGRAM CATEGORIES:**

AS--Apprenticeship FM--Financial Management ML--Migrant Labor TR--Transportation
Standards Requirements NA--Native American Services W-2--Wisconsin Works
CC--Child Care FL--Foreign Labor Certification RA--Refugee Assistance WIA--Workforce
CS--Child Support IT--IT Systems TC--Tax Credit Programs Investment Act
CF--Children First JC--Job Center TA--Trade Assistance
CR--Civil Rights LM--Labor Market Information

POLICY

Costs that can be attributed to this goal include any costs or support services relating to a verifiable expectation that at the end of training the participant will have the skills needed to qualify for a job that is at least at the Workforce Development Area's (WDA's) median wage rate. Costs such as assessment, case management and basic skills services will not count toward meeting the 35% requirement.

Determination of whether training will qualify for the 35% requirement can be made by comparing the median wage for recent graduates of this training to the median wage for the WDA. The median wage for recent graduates can be assumed to be a starting level wage. The most recent Wisconsin Technical College *Graduate Follow-Up Report* (<http://www.wtcsystem.edu/reports/fact/graduate/index.htm>) can be used to determine the median wage for recent graduates. If the wage reported through that survey is the same or higher than the median wage for the WDA, the training (and associated supportive services costs) will count towards the 35% goal.

For training delivered by other providers, the WDB will need to assess similar kinds of information from the training provider to determine if the training will qualify for the 35% goal.

Allowances are made for a "Career Ladder" if a customer is low-skill, but strongly motivated to get a higher skill, better paying job through a series of steps. The first step training will count towards the 35% goal if the following conditions are met:

- a) The WDA determines, through assessment and counseling, that the customer is a good candidate for a long-range plan leading to a higher skill, better paying job;
- b) The *Employability Plan* outlines the various steps and goals in the career ladder;
- c) The WDB is willing to follow the customer and support their efforts to reach the long-term career goal.

An example of this "Career Ladder" would be a customer who wants to become a Licensed Practical Nurse (LPN). One of the pre-qualifications is a Certified Nursing Assistant (CNA) certificate. If the job of LPN meets the median wage test for the WDB, and the WDB determines that the customer is a good risk for the long term goal and develops an *Employability Plan* to reflect that goal, and the WDB is willing to follow the customer through the long-term goal, then the CNA training and associated education and training and supportive services costs could be counted towards the 35% goal.

Once the training has qualified for the 35% goal, then the WDB may also count the following related costs toward the goal as well: tuition, fees, books, essential equipment, specialized clothing, and supportive services including transportation, child care, dependent care, housing and needs-related payments.

Costs can be counted towards the 35% goal from the time they are incurred. In other words, a customer does not have to successfully complete the training in order to count the costs toward this goal.

CORE expenditure codes 2715 for the Adult program, 2716 for the Dislocated Worker program and 2717 for the Special Response program have been established to report the costs that apply to these training goals. These new codes are memo-only. 100% of the costs relating to the Adult and Dislocated Worker program will continue to be reported on the codes 2705, 2706 and 2718 respectively, and costs relating to the 35% goal for the high wage jobs will be repeated on these two new line codes.

For evaluating program compliance, the amounts reported on 2715 will be compared to the expenditures-to-date for the Adult program reported on 2705. The amounts on 2716 and 2717 will be combined and compared to the total expenditures for the local Dislocated Worker and Special Response reported on 2706 and 2718.

The Department is looking at PY 2006 as a data gathering year. We will review the data after PY 2006 to determine if the 35% is an appropriate level for the WDBs to meet. Sanctions will not be applied if WDBs do not attain the 35% expenditure level in this first year of implementation. However, we do expect the WDBs to provide a rationale for why the goal could not be achieved.

ACTION SUMMARY STATEMENT:

WDBs need to maintain accounting records to appropriately identify and account for the 35% high wage training costs, and report the amounts on the new CORE line codes beginning with the PY06 funds on July 1, 2006.

CONTACT: If you have any questions about this memo, please contact Mark Macke at 608-266-5309 or mark.macke@dwd.state.wi.us or Dianne Reynolds at 608-266-0988 or dianne.reynolds@dwd.state.wi.us .

Attachment L
Limited English Proficiency Plan
for the
DWD/Division of Workforce Solutions

January 1, 2006

Signature

Bill Clingan
Division Administrator

Signature

Diane Griffin
Division LEP coordinator

DWS is an equal opportunity employer and service provider. If you have a disability and need to access this information in an alternate format, or need it translated to another language, please contact (609) 264-9820 or (608) 261-6971 TTY.

Limited English Proficiency Plan

For

**The Department of Workforce Development (DWD), Division of Workforce
Solutions (DWS)**

January 1, 2006

Table of Contents

- I. Purpose of DWS Limited English Proficiency (LEP) Plan**
- II. Department Limited English Proficiency (LEP) Policy**
- III. Responsibility for the DWS LEP Plan**
- IV. DWS Division Overview and Mission**
- V. Legal Requirements for LEP Services in DWS Programs**
- VI. Identifying DWS Customer Groups and Language Profiles**
- VII. Activities Supporting DWS LEP Policy and Commitment**
 - **DWS Civil Rights Committee**
 - **Language Translation and Interpretation**
 - DWD Interactive Voice Response (VR) System
 - Identification and Translation of Vital Documents
 - Computer Notices and LEP Information Posting
 - Contracted Telephone Interpretation
 - Contracted Written Translation Services
 - Contracted Agency Interpretation Services
 - Use of Family, Friends and Minors as Interpreters
 - Bilingual DWD Staff
 - Special Assistance
 - ◆ Wisconsin Coalition for Linguistic Access to Health Care
 - ◆ Special Hmong Refugee Resettlement Support
 - **Contract Agency Civil Rights and LEP Compliance**
 - **Monitoring of Local Agency Civil Rights/LEP Compliance**
 - **Technical Assistance and Training**
 - DWD/DWS Civil Rights and LEP Websites
 - Interpreter Training
 - DWS Staff Training
 - Training and Technical Assistance for Contract Agencies
 - **Civil Rights and LEP Complaint Investigation and Processing**
- VIII. DWS Plan Dissemination, Revisions and Effective Dates**
- IX. References**

**Limited English Proficiency Plan
for
The Department of Workforce Development (DWD), Division of Workforce Solutions
(DWS)
January 1, 2006**

I. Purpose of the Division Limited English Proficiency (LEP) Plan

This Plan provides a vehicle for DWS to:

- A. Communicate Department and Division LEP Policies;
- B. Designate a DWS LEP Coordinator and back-up Coordinator;
- C. Describe expectations for program delivery that meets requirements for language access
- D. Identify methods being used by DWS to address language access needs: and
- E. Describe current and planned activities in support of language access.

This plan's major elements are incorporated into the DWS Civil Rights Compliance Plan required by reference I. above, which is shared with federal funding agencies.

II. Department and Division LEP Policies

- A. Department of Workforce Development LEP Policy: It is the policy of the Department of Workforce Development (DED) to provide meaningful access to, and information about, all programs and services made available by the Department, to any individual in need of and qualifying for, department programs and services at no cost to the customer. The Department will ensure access to services or programs to LEP individuals by providing program information in alternate languages and formats, which may includes, but may not be limited to providing interpreters, or translation, as necessary.

Each DWD division is responsible for creating LEP procedures based on this policy that is reflective of its specific programs, services and customers. This document outlines how the Division of Workforce Solutions (DWS) will meet its LEP obligations required by department policy and applicable Civil Rights legislation. DWS uses the term Civil Rights Compliance to mean programs for equal opportunity, affirmative action and for services to persons with limited English proficiency.

- B. Division of Workforce Solutions LEP Policy: The Division of Workforce Solutions (DWS) Limited English Proficiency (LEP) Policy supports DWD department LEP policy. The DWS is committed to providing equal opportunity in all DWS programs and services to enable full compliance with Civil Rights laws, including provision of language access services for persons with limited English proficiency as follows:

Customers with LEP will receive timely oral interpretation or access to translated written materials at no cost to them.

DWS program grantees and contractors are subject to full compliance with civil rights laws and are responsible for similar full compliance of their sub-grantees and sub-contractors.

III. Responsibility for the DWS LEP Plan

The Bureau of Division-Wide Services (BDS), of the Division for Workforce Solutions (DWS) has been designated by the Division Administrator as the lead Bureau with primary responsibility for developing and implementing the Limited English Proficiency Plan of the Division. The lead staff are as follows;

DWS LEP Coordinator: Dian Griffin Section Chief, Program Operations Section, BDS

DWS Back-Up LEP Coordinator: William Franks Equal Opportunity Specialist, Program Operations Section, BDS

All Bureaus within DWS have a responsibility to contribute in the development and implementation of language access services and procedures and to assure compliance with the LEP Plan.

The organizational structure of DWS and information the service/program areas that the Division administers can be found at the DWS site:

<http://dwd.wisconsin.gov/dws/division.htm>.

Administrator's Office	(608) 266-6824	Bill Clingan, Division Administrator
Apprenticeship Standards	(608) 266-3133	Karen Morgan, Director
Child Support	(608) 267-8978	Susan Pfeiffer, Director
Division-Wide Services	(608) 266-6721	Joan E. Larson, Director
Job Service	(608) 267-7514	Brian Solomon, Director
Migrant, Refugee & Labor Services	(608) 266-0002	Sue Levy, Acting Director
W-2	(608) 266-7160	Nancy Buckwalter, Director
Workforce Information	(608) 266-8212	Sandra Breitborde, Director
Workforce Programs	(608) 267-9704	Connie Colussy, Director
Office of Economic Initiatives	(608) 266-0522	Sue Gleason, Director

IV. DWS Division Mission and Overview

The Division's mission is to provide a seamless continuum of services that will be accessed by employers, members of the workforce with the following results:

- Employers have the workforce they need;
- Individuals and families can achieve economic self-sufficiency by accessing quality support services, making sound employment decisions, and maximizing their potential in the workforce;
- All children have the financial support they need from both parents.

Assuring full participation in the workforce is important in the accomplishment of this mission. Removing barriers that may exist because of language issues is one way to enhance participation in the workforce and in the programs that DWS administers. The Division is involved in both direct services to program applicants and participants and in the oversight and monitoring of local agencies providing direct services.

- Key programs administered by the Division include: Apprenticeship, child support, child care, Wisconsin Works (W-2) and related programs, migrant and refugee services, programs provided under the Workforce Investment Act and Wagner Peyser funding and associated activities.
- Key services provided by the division included: the administration of Wisconsin's Job Center Network, state labor market information and public assistance collections and economic development and implementation of statewide program services and economic initiatives, and research and statistical analyses of program outcomes.

V. Legal Requirements for LEP Services in DWS Programs

Federal and State laws and program regulations that guide DWS programs provide the legal requirements for Civil Rights Compliance, including requirements for equal opportunity, affirmative action, and services to LEP persons. The following are the federal agencies that guide key DWS-administered programs:

Federal Agencies	Key DWS-Administered Programs
The U.S. Department of Health and Human Services	Child Support Enforcement, Child Care, W-2 and Refugee Services
The U.S. Department of Agriculture	Food Share Employment and Training Program—DWD administers this program under a Memorandum of Understanding (MOU) with the Wisconsin Department of Health and Family Services.
The U.S. Department of Labor	Veterans and Migrant Services; Youth, Adult and Dislocated Worker programs under the Workforce Investment Act and public employment services under Wagner-Peyser funds.

Oversight of Requirements

- DWS develops and administers the Civil Rights Compliance (CRC) Plan requirements for programs funded under the U.S. Department of Health and Human Services. These requirements are developed in collaboration with the Wisconsin Department of Health and Human Services (DHSS) because many of the same agencies that receive federal funding from DWS also receive funding from DHSS. DWS and DHSS review and approve the CRC Plans of funded agencies. They also jointly develop and conduct training and

coordinate monitoring activities. DWS Administrator's Memo ADM 04-02 issued the CRC Plan requirements for 01/01/04-12/31/06. These can be viewed by visiting DWS internet site: DWD and DHFS Civil Rights Compliance Plan Requirements for 01/01/04-12/31/06 at <http://dwd.wisconsin.gov/dws/adminmemos/pdf/2004/04002.pdf>. This link identifies DWS Civil Rights and LEP compliance requirements for its multiple programs, grantees, and contractors based on federal program requirements for programs funded from the U.S. Department of Health and Human Services.

- DWS also develops and updates the State's Methods of Administration (MOA) for the Workforce Investment Act (WIA) programs funded under the U.S. Department of Labor. The regulations that implement the nondiscrimination and equal opportunity provisions of WIA require that each Governor establish and adhere to a MOA for his/her State programs. The MOA describes the actions an individual State will take to ensure its WIA Title I-financially assisted programs, activities, and recipients are complying, and will continue to comply, with the nondiscrimination and equal opportunity requirements of WIA and its implementing regulations. Compliance with DWS LEP Plan is included in the MOA.

VI. Identifying DWS Customer Groups and Language Profiles

The Division used US Census 2000 data for Wisconsin as a starting point for the identification of populations that may have limited English proficiency. In addition, the Department of Public Instruction collects data on students and their ability to understand English and extrapolations are made concerning parents of school age children. In Wisconsin as a whole, Spanish and Hmong languages have been identified as significant LEP portions of the population statewide. In addition, some individual counties can have significant minority populations with other language needs (e.g., Russian, Bosnian, Serbian, Croatian, Somali, etc.). The Plan Requirements previously referenced Admin Memo ADAM 04-02 provide compliance requirements to DWS contractors/grantees on how to address and better serve local LEP populations. A direct link to LEP population demographic data for Wisconsin counties and LEP contract guidance can also be viewed at: http://dwd.wisconsin.gov/dws/civil_rights/plans_instructions.htm.

VII. Activities Supporting DWS LEP Policy and Commitment

DWS provides an array of activities and initiatives to support the commitment to the DWS LEP Policy. These are provided as follows:

A. DWS Civil Rights Committee

The Civil Rights Compliance Committee is an advisory group made up of representatives from the DWS Bureaus to help address Civil Rights issues of compliance for the Division's federal financial assistance programs and Civil Rights (e.g. Affirmative Action, Equal Opportunity and LEP) regulations and requirements. The group meets on a monthly basis and addresses both policy and implementation issues, including reviewing and making recommendations for changes to the DWS LEP Plan. Committee members represent the division's bureaus and bring a variety of

experiences and perspectives to the workgroup. Committee members and minutes of the meetings are maintained on an internal DWD work-web site. This committee is chaired by the DWS LEP Coordinator or the DWS Back-Up LEP Coordinator.

B. Language Translation and Interpretation

DWS Interactive Voice Response (IVR) System: DWS provides service program information about DWS programs and services to customers by phone through an interactive voice response system. A caller is provided an opportunity at the beginning of the call to identify himself or herself as a Spanish or Hmong speaker. Once that identification is made, the operator connects with the DWD telephone interpretation service to determine what information the customer is seeking. Due to low usage and high costs, DWS is also exploring other methods of providing call-in customers with basic information about DWS programs and services in multiple languages.

Identification and Translation of Vital Program Documents: DWS will provide for translation of all written materials for each LEP group that represents 10% or 3,000 (whichever is less) of the eligible populations. Vital documents are those documents, paper or electronic, that contain critical information for accessing adjusting or eliminating services or benefits or is a document required by law. Therefore, vital documents will be translated for each LEP group that represents 5% or 1,000 (whichever is less) of the eligible population.

The BDS Civil Rights Unit is responsible for updating the DWS Inventory of Vital Documents on a periodic basis. Updates are posted at the DWS LEP web site: <http://dwdworkweb/dws/lep/default.htm> , which show the number of vital documents, the number of documents translated into Spanish and Hmong, plus some documents that have been translated into other languages. Currently, there were 241 vital program documents translated in DWS. Of those, 174 have been translated into Spanish and 160 have been translated into Hmong. Other languages into which some DWS documents have been translated include Albanian, Bosnian/Serbian/Croatian, Cambodian, Hmong, Laotian, Russian, and Vietnamese. The projected date for having DWS caught up with translation of all vital documents is June 30, 2006. Each Bureau may also translate documents that are not considered vital documents, as desired. The DWS Civil Rights Compliance Workgroup recommends that a minimum of 5 documents be translated per bureau per month until the backlog is addressed.

Computer Notices and LEP Information Posting: When a Client Reemployment and Economic Support (CARES) computer system program notice cannot be provided in Spanish or Hmong and affects benefits or services, that notice must be provided in the appropriate major language group served which indicates how to obtain a translation of the notice, in the secondary language.

DWS and all contract agencies providing direct customer service will ensure that written language access rights are distributed in the two primary languages (e.g. Spanish and Hmong) through posting of signs in public gathering areas, customer orientations, statements in appeal notices, and statements in program information brochures, booklets, etc. routinely distributed to the public. Language access statements shall inform LEP clients of the right to interpreter services at no cost to them, the right not to use relatives or friends as interpreters, and the right to file a grievance about LEP services provided to them. DWS and contract agencies

providing direct services to LEP customers are required to post information on the Equal Opportunity Policy and the Discrimination Complaint Process in public areas in major LEP languages, including local points of contact.

Contracted Telephone Interpretation: DWD currently has a contract with Certified Languages International to provide oral translation in the language of the caller to English via telephone <http://www.certifiedlanguages.com/>. The contract requires that the vendor provide translation in the following 13 languages at a minimum - Spanish, Hmong, Albanian, Russian, Polish, Bosnian/Croatian/Serbian, Burmese, German, Laotian, Somaligna, Thai, Tibetan, and Vietnamese. Interpreters must be available 24 hours a day, 7 days a week. DWS grantees and contract agencies are encouraged to subscribe to this translator system through the State's related vendor system at lower State rates to assist their customers with verbal translation services. Contact the DWD Purchasing Agent at (608) 267-3394 for further information on this service.

Contracted Written Translation Services: DWD obtains written translation of documents through various vendors under contract with the Department. Vendors are selected under a competitive bidding process for a two year period with two optional yearly renewals possible in each contract. As of December 20, 2004, ten vendors were included in the translation service State bulletin, which covers services of original translation plus proof-only work and layout. Price differs by turn-around time requested and by length of document. In total, these vendors provide written translation services for 55 different languages.

Contract Agency Interpretation Services: DWS program contract agencies are required to provide LEP customers with an oral interpreter in a timely manner when needed for service delivery. These resources will be made available to local contact agency staff to assist them with their LEP customers.

Use of Family, Friends, and Minors as Interpreters: DWS requires that minor children cannot be used as interpreters. Adult family members or friends of an applicant/participant may serve as translators/interpreters only after:

- the agency/provider informs the person with limited English proficiency of the right to free interpreter services;
- the person declines such services and requests the use of a family member or friend; and,
- the agency determines the use of such a person would not compromise the effectiveness of services or violate the confidentiality of the person with limited English proficiency.

When using a family member/friend, agencies/providers should:

- document the use of a family member/friend and place in the LEP person's file; and
- Have a trained interpreter sit in on the encounter when possible to ensure accurate interpretation.

Bilingual DWD Staff: DWS Division will assess vacancies that occur during the timeframe of this plan, to determine the need for filling those vacancies with staff that

possess bilingual skills. The Division will target positions in parts of Wisconsin where the concentration of Spanish and Hmong target populations indicate the most need for bilingual staff, to better serve LEP customers. The Division will implement these changes with current or projected funding resources. The Division will identify Spanish and Hmong populations to be served and determine by location where bilingual staff resources need to be allocated.

Special Assistance

- **Wisconsin Coalition for Linguistic Access to Health Care:** DWD maintains representation in the Wisconsin Coalition for Linguistic Access to Health Care. In order for workers to participate in the employment opportunities of the state, they must be able to address health care issues. Efforts to create a certification program for qualified language interpreters for medical situations may contribute to the broader availability of trained language interpreters who are culturally and linguistically competent.
- **Special Hmong Refugee Resettlement Support:** Special service support actions have been implemented to better serve over 3,200 Hmong refugees scheduled for resettlement from the Wat Thamkrobok site in Thailand to Wisconsin by the US State Department. Special coordination by DWS was established with the Voluntary Agencies of Resettlement (VOLAGs), community based organizations, including Mutual Assistance Associations (MAAs), and the DWS W-2 agencies. Also, DWD has twenty-one contracts with the local Public Health Department to provide health screening services for newly arrived refugees. All services provided to these refugees are linguistically appropriate and cultural competent. In addition, the Governor's office created a Special Advisory Hmong Resettlement Task Force to provide advice to the Governor and DWD Secretary on matters relating to the resettlement. On <http://dwd.wisconsin.gov/hrtf/default.htm>

C. Contract Agency Civil Rights and LEP Compliance

Many DWS program services are delivered through contracts with local agencies rather than by division employees. DWS contracts and administrative requirements e.g. Admin Memo 04-02 require that agencies complete a Civil Rights Compliance Plan outlining their Equal Opportunity LEP and Complaint policies and procedures at the beginning of each contract period. Their plan includes an analysis of the contract agency's workforce and customer population and method for documenting services. DWS Civil Rights staff review local agencies' plans, work with agencies to address deficiencies, provide technical assistance and training to local agency program directors, Equal Opportunity Coordinators, LEP Coordinators, Complaint Coordinators and staff.

The current plan period is January 1, 2004 through December 31, 2006. Contract agencies have either submitted a completed Civil Rights Compliance Plan or appropriate letter of assurance for the current period. Agencies are expected to prepare annual updates of their plans and keep them on-file locally in the event of an on-site monitoring visit.

D. Monitoring of Local Agency Civil Rights/LEP Compliance

DWS Civil Rights staff members are involved in both desk and on-site monitoring reviews of local agencies for compliance with Civil Rights and LEP requirements and in the resolution of complaints. In addition, DWS local contract managers also perform some monitoring functions. The information is shared between DWS contract managers and DWS Civil Rights staff to be sure that compliance concerns are addressed timely and appropriately. The Civil Rights/LEP Compliance Monitoring Plan is reviewed and updated annually, along with the monitoring tools and schedule.

E. Technical Assistance and Training

- **DWW/DWS Civil Rights and LEP Websites:** To assist customers, DWS contract/partner agencies and grantees, and Division staff, Civil Rights Compliance and LEP information websites have been created. A direct link to contract Civil Rights requirements plus LEP population demographic data for Wisconsin counties and LEP contract guidance can be found at website:
http://dwd.wisconsin.gov/dws/civil_rights/plans_instructions.htm.

A separate LEP information site can be found at:
<http://dwdworkweb/dws/lep/default.htm>. In addition, a DWD Spanish language information site is being developed to assist that major Wisconsin language group in locating department and division information services. The draft homepage of this site can be found at: <http://dwdintaccpub/espanol/>

- **Interpreter Training:** The DWS Bureau of Migrant, Refugee, and Labor Service (BMRLS) is supportive of non-language specific interpreter training called “Bridging Cultural and Linguistic Barriers”, which is provided by the International Institute of Wisconsin. This is an intensive 10-hour seminar that provides interpreters an overview of the fundamentals of interpreting and the background to continue working and improving as a professional interpreter. This training is divided into three parts-Fundamentals of Interpretation, Interpretation in Health Care, and Interpretation in the Courtroom.
- **Training and Technical Assistance for Contract Agencies:** DWS Civil Rights staff, in collaboration with Civil Rights staff from the Department of Health and Family Services have developed and provided training for contract agency staff. The training course is intended for Agency Heads, Equal Opportunity Coordinators, Limited English Proficiency Coordinators, Affirmative Action Officers and Complaint Coordinators. The course covers the roles and responsibilities of the agency’s CRC lead staff, a review of the complaint process, and it covers the real life application of Civil Rights law by utilizing real complaint case studies.

A new element in 2006 will be the offering of this training via webcast along with resource materials on the Civil Rights web page. This will enable the training team to more effectively reach a broader audience than they have been able to in the past.

DWS Staff Training: The DWS Civil Rights Workgroup has developed a Civil Rights training plan for all DWS staff. This training will be conducted by the DWS Civil Rights Compliance team and will be provided annually beginning in the Fall of 2005. Under this plan, training will be provided in a number of different formats (in person, via

conference calls, and/or via computer) to minimize cost and to provide flexible scheduling for Division staff. The training will include the following:

- Technical training on how to respond to telephone or in-person inquiries from individuals who are not proficient in English by using a contracted telephone interpreter.
- Review of DWD policies that prohibit discrimination and harassment.
- What a contract manager needs to know to assure Civil Rights Compliance by agencies that contract with DWD.
- Cultural awareness to deepen understanding and appreciation of differences among people.
- Web based Civil Rights/LEP reference handout for Supervisors.

F. Civil Rights and LEP Complaint Investigation and Processing

The Division has a complaint coordinator for civil rights and discrimination complaints regarding language access from applicants or recipients of DWS program services. The Affirmative Action Officer handles DWS employee complaints of discrimination. A coordinated complaint process has been developed and implemented in local Job Centers that support multiple DWS programs. An individual making the complaint may be applying for or receiving many services funded by different federal agencies. The goal is to make the process for filing a complaint straight forward and understandable, while preserving all of the avenues for remedy available to our customers.

VIII. DWS LEP Plan Dissemination, Revisions and Effective Dates

This plan will be shared with the DWS Management Team and responsibilities and expectations will be discussed. In addition, it will be posted on the DWS LEP web site and all division staff will be notified and encouraged to review the plan. A copy of the plan will be provided to federal funding agencies as appropriate.

This plan will be reviewed annually for needed revisions. The plan will remain in effect until modified by a new effective date.

IX. References:

U.S. Presidential Executive Order 13166 – Improving Access to Services for Persons with LEP

DWD Policy 417- Limited English Proficiency (LEP) Policy, Last Updated October 1, 2001

DWD/DWS Administrator's Memo (Admin Memo) 04-02, (Contract and Grant) Civil Rights Compliance Plan Requirements for January 2004 to December 2006
http://dwd.wisconsin.gov/dws/civil_rights/plans_instructions.htm

Civil Rights Act of 1964, as amended, Titles VI and VII
Civil Rights Compliance Plans 2004 – 2006, Attachment 3 “How to file an employment or service delivery discrimination complaint”
http://dwd.wisconsin.gov/dws/civil_rights/plans_instructions.htm

Operations Memo 04-05 - "W-2 Agency Use of DWS Displacement Grievance Procedures" located at DWS website: <http://www.dhfs.wisconsin.gov/em/ops-memos/2004/pdf/04-05.pdf>

Administrator's Memo 03-33 - "Displacement of Regular Employees by W-2, WtW, and WIA Participants-Grievance Policies and Procedures" located at DWS website: <http://dwd.wisconsin.gov/dws/adminmemos/pdf/2003/03033.pdf>

Workforce Programs Guide; Part 1-Administration of Workforce Programs, Section III, Item S - Complaints /Grievances and Appeals located at DWS Website: http://dwd.wisconsin.gov/dws/manuals/workforce/PART%201/Part1_Adm.pdf **Translation service bulletins**, <http://dwdworkweb/asdproc/procmanual/014.htm>

Attachment M

Veterans

April 13, 2005

TO: Job Service District Directors, WDB Directors, Job Service Supervisors, Job Center Managers, WIA Managers, TAA Managers, LVERs, DVOPs, DOL/VETS

FROM: Bruce Markert, State Veterans Program Coordinator
Veterans' Unit
Job Service Bureau

Veteran Program Letter 01-05

SUBJECT: Implementing the Veterans' Priority Provisions of the "Jobs for Veterans Act" (P.L. 107-288).

I. PURPOSE:

To inform state agencies and other Department of Labor (DOL) funded workforce investment partners of the veterans' priority provisions of the 'Jobs for Veterans Act' and to provide guidance as to the implementation of these provisions.

II. REFERENCES:

'Jobs for Veterans Act' (Public Law 107-288), dated Nov. 7, 2002.

Implementing the Veterans' Priority Provisions of the "Jobs for Veterans Act" (P.L. 107-288), USDOL, ETA, TEGL No. 5-03, dated Sept. 16, 2003.

Implementing the Veterans' Priority Provisions of the "Jobs for Veteran Act" (PL 107-288), State Veteran Program Letter No. 3-04, dated Oct. 1, 2003.

Serving Military Service Members and Military Spouses under the Workforce Investment Act Dislocated Worker Formula Grant, USDOL, ETA, TEGL No. 22-04, dated March 22, 2005.

III. BACKGROUND:

The Jobs for Veterans Act (P.L. 107-288), which was enacted on November 7, 2002 provides access to services with all Department of Labor integrated service delivery programs. Public Law 107-288 establishes "priority of service" requirement applicable to all DOL Employment and Training programs.

This Veteran Program Letter provides policy regarding this requirement as outlined in TEGL 05-03, which was issued by ETA to implement the Jobs for Veterans Act. WIA reauthorization will include veterans' priority guidance when re-issued.

For further information including performance standards associated with veterans' priority with specific DOL-funded workforce programs, go to <http://www.doleta.gov/programs/VETS>.

'Qualified job training program' is any workforce preparation, development, or delivery program or service that is directly funded, in whole or in part, by the Department of Labor.

'Priority of Service' means, with respect to any qualified job-training program, that a "covered person" shall be given priority over non-veterans in the receipt of employment, training, and placement services provided under the program.

Key implementation principles are:

- For all programs, veterans must first meet the program's eligibility provisions.
- Veterans' priority is not intended to displace the core function of the DOL programs.
- For programs with existing targeting provisions, the veterans' "priority" must be applied by assessing a person's status in light of both the existing program provision(s) and the veterans' priority provision.
- The exact manner in which the veterans' priority will be applied will vary considerably depending upon the services offered.

Programs Covered:

- WIA Adult Formula
- WIA Dislocated Worker Formula
- Wagner-Peyser Employment Services
- Trade Act Programs (TAA)
- National Emergency Grants (NEG)
- Senior Community Serve Employment Program (SCSEP)
- Migrant Seasonal Farmworker (MSFW)
- Indian and Native American Programs
- H-1B Technical Skills Training Grants
- Job Corps
- WIA Demonstration Projects
- Youth Opportunity Grants
- WIA Youth Formula
- Labor Market Information Formula Grants
- Pilot Programs
- Research and Development
- Career One-Stop Electronic Tools and Other Internet-Based Self-Service Tools Operated by USDOL Grantees

IV. ELIGIBLE GROUPS:

Under the Jobs for Veterans Act, "covered person" is defined as:

- A veteran (is an individual who served in the active military, naval, or air service, and who was discharged or released from such service under conditions other than dishonorable, which may include National Guard or Reserve personnel.), or
- The spouse of any of the following individuals:

- Any veteran who died of a service-connected disability;
- Any member of the Armed Forces serving on active duty who, at the time of application for assistance under this section, is listed, pursuant to section 556 of title 38 and regulations issued thereunder, by the Secretary concerned in one or more of the following categories and has been so listed for a total of more than 90 days:
 - missing in action,
 - captured in line of duty by a hostile force, or
 - forcibly detained or interned in line of duty by a foreign government or power;
- Any veteran who has a total disability resulting from a service-connected disability; or
- Any veteran who died while a disability so evaluated was in existence.
 - A Military Spouse is an individual who is married to an active duty service member including National Guard or Reserve personnel on active duty.

For convenience purposes, reference in the VPL of the use of veterans and qualified spouses is synonymous with “covered persons.”

V. POLICY GUIDANCE:

A. Workforce Investment Act (WIA) Adult and Dislocated Workers Program (also applicable to Welfare-to-work)

1. Program operators will need to capture veterans’ status.
2. The veterans’ priority cannot be waived.
3. Eligibility for the WIA Adult and Dislocated Worker program is not affected by the veterans’ priority. The Jobs for Veterans Act (JVA) provides priority service only to veterans who meet the program’s eligibility requirements.
4. TEGL # 5-03 provides specific guidance on: (a) the interaction of the veterans’ priority with existing program requirements that target specific groups, and (b) makes note of the fact that local programs are not required to change their allocations among services to reserve funds for veterans, but (c) are required to ensure that eligible veteran participants are given priority over non-veterans for all available services.
5. TEGL # 22-04 states that the Department of Labor policy that being discharged (under honorable circumstances) either voluntarily or involuntarily terminates an employment relationship between an individual and the military and thus falls within the scope of the termination component of the WIA definition of dislocated worker. The separating military personnel must also satisfy the other criteria for dislocated worker eligibility, including the requirement that the individual is “unlikely to return to a previous industry or occupation.”
6. TEGL #22-04 states that a military spouse who leaves his/her job to follow his/her spouse can be served with dislocated worker formula grant funds in certain circumstances. When the spouse is unable to continue an employment

relationship because of the service member's permanent change of military station, or the military spouse loses employment as a result of the spouse's discharge from the military, then the cessation of employment can be considered to meet the termination component of the WIA definition of dislocated worker, as discussed above. The military spouse must also satisfy the other criteria for dislocated worker eligibility, including the requirement that the spouse is unlikely to return to a previous industry or occupation. Additionally, a military spouse may also qualify to be served as a dislocated worker if he/she meets the definitional requirements for a displaced homemaker.

7. Dislocated workers who are veterans will receive priority over non-veterans. Veterans who are not dislocated workers cannot be served with dislocated worker funds. Current law requires that first priority for intensive and training services is given to public assistance recipients and low-income individuals when adult funds allocated to a local area are limited
8. First to be served would be public assistance recipients and low-income individuals that are also veterans. The second group to be served would be public assistance recipients and low-income non-veterans. Among participants who are not public assistance recipients or low-income individuals, veterans will receive priority over non-veterans.
9. Current law on Welfare-to-Work (WtW) requires that program operators spend no more than 30 percent of the funds on individuals that meet the "other eligibles" eligibility provisions 20 CFR Part 645.213. The veterans' priority does not change the 30 percent limit on "other eligibles." In providing services to individuals under the 30 percent eligibility provision, the priority of service would be established as follows: First to be served would be individuals that qualify in the category as "other eligibles" who are also veterans. The second group to be served would be those individuals that qualify in the category of "other eligibles" who are non-veterans. If a program has reached the 30 percent limit, a person's status as a veteran does not permit the program to exceed the 30 percent limit on "other eligibles."

B. Dislocated Worker Demonstration Grants (DW Demo).

1. Program will be implemented in the same manner as the WIA formula dislocated worker program, except that the priority will apply only to the eligible target group for which the demonstration is being conducted, as identified in the SGA (Solicitation for Grant Application) and any award grants.
2. Each SGA and grant award document will include standard language regarding compliance with the Jobs for Veterans Act, which will also be included in subgrants or contracts which provide services procured as part of any demonstration project.
3. Those who meet the eligibility qualifications of the individuals to be served under a particular demonstration initiative, and are also covered veterans, will be given priority.
4. Also see Section V, A, items 5 and 6 for inclusion of military service members and military spouses.

C. Dislocated Worker National Emergency Grants Program.

1. Program will be implemented in the same manner as the WIA formula dislocated worker program, except that the priority will apply only to the eligible target group (e.g., workers dislocated or being dislocated from XYZ corporation, or workers dislocated as a result of a disaster) as identified in each NEG grant.
2. Veterans' priority cannot be waived.
3. Grantees of NEG funds will be required to ensure that project operators have systems in place to comply with the changes and implementation of the priority for the dislocated worker who is a veteran and is from the eligible, specific target population of NEG grants. Those workers being laid off by the companies for which a NEG grant is awarded, and who are veterans, will receive priority over non-veterans. Generally, awarded funds are sufficient to provide needed service for all workers impacted by a covered mass layoff or plant closure, or other eligible dislocation event.

Veterans who are dislocated workers from companies other than those covered under a NEG project, are not eligible to receive assistance under a NEG, but would be served in the local One-Stop Career Center with funds from the local formula-funded dislocated worker program.

4. Until a more standardized approach is developed by the Department of Labor, grantees and applicable project operators and service providers will need to collect veteran status information on those served, as well as the veteran status of the workers laid off from the mass layoff or plant closure covered under a particular NEG.

D. The Workforce Investment Act (WIA) Youth Formula Funded Program.

1. The principles expressed in Training and Employment Letter #5-03 (which provides overall guidance on how the veteran's priority applies to all workforce system programs) must be implemented. It is, therefore, likely that program operators may need to do things such as design registration forms and other program materials to capture veterans' status, if this is not already being done, and modify ways of doing business in order to carry out the intent of the law.
2. The veterans' priority cannot be waived.
3. The Employment and Training Administration (ETA) will execute unilateral modification to existing grants in order to assure that the new statute is emphasized and included. Grantees will be informed and will be expected to pass the requirements down as necessary to sub-grantees and contractors.
4. Eligibility for the WIA Youth program is not affected by the veterans' priority. The Jobs for Veterans Act provides priority service only to veterans who meet the program's eligibility requirements. TEGL #5-03 provides specific guidance on: (a) the interaction of the veterans' priority with existing program requirements that target specific groups, and (b) the fact that local programs are not required to

change their allocations among services to reserve funds for veterans, but (c) are required to ensure that eligible veteran workers are given priority over non-veterans for all available services.

For example:

- WIA youth funds are available to serve low-income youth age 14-21 with one or more barriers to employment.
- The priority provision at WIA sec. 129 (c)(4) requires, with limited exceptions, that program operators ensure that at least 30 percent of local area funds be used to serve out-of-school youth.
- The veterans' priority does not change these requirements.
- In providing services to both in-school and out-of-school youth, priority should be given to any veterans who qualify under the WIA eligibility requirements.
- However, a person's status as a veteran does not permit the program to avoid the 30 percent out-of-school youth requirement (that is, a program may not exceed 70 percent of expenditures on account of veteran status.)

E. The United States Employment Service (USES) Program.

1. USES has historically provided veterans' priority of service in the public labor exchange system.
2. This priority includes, but is not limited to:
 - Registration and Assessment
 - Counseling
 - Referral to supportive services
 - Job Development
 - Workshops
 - Job Order Referral and Access to Job Openings
3. See Section H. on veteran's priority relative to "The Career One-Stop National Electronic Tools and State-Developed Self-Service Web Sites."

F. Trade Adjustment Assistance Program (TAA).

1. It is not anticipated that extensive changes in the way the Trade Adjustment Assistance Program is administered would be necessary. Petitioning for certification, investigating those petitions and making determinations would follow existing procedures.
2. However, individual veterans would be afforded priority, if certified as a trade affected worker, in having their training services, job search and relocation allowances funded by the states.

G. The Unemployment Insurance Program (UI).

1. The Unemployment Insurance Program Letter (UIPL), No. 41-91, pertaining to the Worker Profiling and Reemployment Services System, will need to be amended. The amendment will include two options for state workforce agencies:

- a. In cases where the profiling statistical model produces identical probabilities for a number of claimants, break the tie by providing veterans' preference when determining who would be referred to services;
 - b. Simply refer all people in the tied group to services, precluding any issues of unfairness.
2. States currently develop their own statistical models for profiling unemployment insurance claimants for referral to services. The veterans' priority requirement will not impose a change in state profiling models, but rather in the way claimants are referred to services. Claimants with the highest probabilities of exhaustion will still be referred to services first. However, in cases where the statistical model produces identical probabilities for a number of claimants, veterans will receive priority in referral to service. If states have information on veteran's status at the time they do their referrals, they can use this to resolve ties produced by their statistical mode. Alternatively, they can opt to simply refer all people in the tied group, which should preclude any issues of unfairness.

H. The Career One-Stop National Electronic Tools and other State-Developed Self-Service Web Sites.

1. The veterans' priority established by the Jobs for Veterans Act applies to the Career One-Stop National Electronic Tools and applies to any state-developed self-service tools using Wagner-Peyser Act, WIA, or America's Labor Market Information System (ALMIS) funds in their development. There will be little change to the Career One-Stop National Electronic Tools required. The amount required of state-developed self-service sites depends on what type of priority was already being given to veterans.
2. Veteran's priority cannot be waived.
3. Language will be added to each of the grants provided to develop the Career One-Stop National Electronic Tools. State-developed web sites will be covered by the grant awards under Wagner-Peyser, WIA, etc.

I. Senior Community Service Employment Program.

1. The Jobs for Veterans Act establishes priority for veterans and qualified spouses for receipt of services ONLY IF the veteran or his/her qualified spouse meets program eligibility requirements.
2. The veterans' priority is a statutory mandate, but it is not intended to displace the core function of the program.
3. The specific order of priority for selection of participants will be as follows:
 - a. Veterans and qualified spouses who are at least 60 years old.
 - b. Other individuals who are at least 60 years old.
 - c. Veterans and qualified spouses who are 55-59 years old.
 - d. Other individuals who are 55-59 years old.

4. These priorities will be harmonized with the special consideration preferences of section 502(b)(1)(M) the OAA, as amended, to the extent feasible. These statutory preferences apply to the following individuals: 1) those who have incomes below the poverty line; 2) those who have poor employment prospects and who have the greatest social and/or economic need; and 3) those who are eligible minorities, limited English speakers, or Indians. These preferences should be considered within the context of the statutory priorities. For example, among eligible veterans and qualified spouses age 60 and over, to the extent practicable, preference should be given to individuals within these three categories.

J. Job Corps.

1. Job Corps will amend its Policy and Requirement Handbook (PRH) and related procedures as necessary to reflect the implementation of the Jobs for Veterans Act. The PRH provides overall guidance on all aspects of the administration of the Job Corps Program and all the operational systems and procedures are based on it.
2. Veterans' priority may not be waived.
3. Basic eligibility is not changed but the priority may affect enrollment. This is the major area for Job Corps to amend its policies and procedures to implement the Jobs for Veterans Act. Job Corps has drafted the following new language in its policy on outreach and admission: "An individual who meets all of the eligibility requirements listed above and is a veteran of the Armed Forces of the United States (Army, Navy Air Force, Marine Corps, or Coast Guard) or spouse of a veteran as specified in the Eligibility Criteria section, will receive priority in enrollment at Job Corps centers."

K. The Indian and Native American Employment and Training Program (DINAP).

1. DINAP will issue a DINAP Bulletin with implementation instructions and guidance for the priority provisions of P.L. 107-288. Grantees will have to address this service priority in their comprehensive service plans. Formal inclusion of this priority in section 166 grant documents will also occur.
2. Veterans' priority may not be waived.
3. Except for the requirements to provide service priority to eligible veterans, the section 166 eligibility requirements will not change at all – any individual served must still (by law) be an Indian, Alaska Native, or Native Hawaiian as documented by the grantee at time of enrollment and/or program participation.

L. National Farm Worker Jobs Program (NFJP).

1. NFJP authorized by Section 167 of the Workforce Investment Act of 1998, establishes specific eligibility criteria for migrants and seasonal farmworkers seeking services from the program. The Jobs for Veterans Act states that to obtain priority of service, a veteran must meet that program's eligibility requirements; therefore, we do not anticipate a change in the way the program is administered.

2. Division of Seasonal Farmworkers Programs (DSFP) will work with the Office of Grants and Contracts Management to determine the specific boiler plate language that should be included in the grant documents to ensure compliance with P.L. 107-288.

M. Pilot, Demonstration and Research Grants Program.

1. The priority will not result in extensive changes, but some changes will be necessary. Program operators may need to do things such as design registration forms and other program materials to capture veterans' status if this is not already being done, and modify ways of doing business in order to carry out the intent of the law.
2. Veterans' priority may not be waived.
3. The Employment and Training Administration (ETA) will execute unilateral modifications to existing grants in order to assure that the new statute is emphasized and included. No action by grantees will be necessary, except that they will be expected to pass the requirements down as necessary to sub-grantees and contractors.
4. Eligibility for the Pilot, Demonstration and Research Grants program is not affected by the veterans' priority. The Jobs for Veterans Act provides priority service only to veterans who meet the program's eligibility requirements. TEGL #5-03 provides specific guidance on (a) the interaction of the veterans' priority with existing program requirements that target specific groups, and (b) makes note of the fact that local programs are not required to change their allocations among services to reserve funds for veterans, but (c) are required to ensure that eligible veteran workers are given priority over non-veterans for all available services.

Generally, pilot, demonstration and research grants are awarded to specific target groups. Individuals must first meet the eligibility criteria for the program group, and then the order of service priority would depend on the veteran status.

N. H-1B Technical Skills Training Grant Program.

1. H1-B grantees may need to do things such as design registration forms and other program materials to capture veterans' status, if this is not already being done, and modify ways of doing business in order to carry out the intent of the law. The Department of Labor will not be issuing regulations or detailed operational requirements which H-1B grantees must follow (requiring, for example, that an individual must show proof of veteran status using documentation such as the Department of Defense Form 214 in order to qualify for priority service). H1-B grantees may be obliged to do so at their own discretion and are encouraged to work with State and local Workforce Investment Boards who may be able to provide assistance on developing operational requirements.
2. Veterans' priority may not be waived.
3. The Employment and Training Administration (ETA) will execute unilateral modifications to existing grants in order to assure that the new statute is

emphasized and included. No action by grantees will be necessary, except that they will be expected to pass the requirements down as necessary to sub-grantees and contractors.

4. See Section XIII D paragraph one for H-1B guidance. Among H-1B participants, individuals who are veterans receive priority for training over non-veteran H-1B participants.

VI. ACTION REQUIRED:

This veteran program policy letter should be shared with all appropriate staff including Board staff, WIA staff, DOL program staff, and all Job Center staff.

Local WDBs must develop a local policy that addresses how priority of services to veterans and other covered persons will be applied. This policy must apply to all DOL-funded programs identified under the Policy Guidance section.

Local procedures should be developed to implement requirements under the Jobs for Veterans Act. Procedures should be developed to ensure that each covered person who applies to, or is assisted by, a program is informed of the employment-related rights and benefits to which they are entitled. Procedures should be developed to monitor compliance with the Act, including compliance by all contractors. Procedures should be developed to review the area's service levels to veterans including the percentage of program participants that are veterans, the percentage of participants who are veterans who received intensive and training services, and an analysis of whether the representation of veterans is in proportion to the incidence of their representation in the labor market.

DOL-funded grants or contracts issued locally must include specific language provided by DOL through the state to ensure that all LWIA grantees/contractors are fully aware of the Jobs For Veterans requirements and of their obligation to design and deliver services accordingly. Existing grants and contracts must be modified to include such language.

Outreach, marketing and self-service tools, including DOL-funded web sites and brochures, must provide information on veterans' priority (employment-related rights and benefits to which they are entitled under the Jobs for Veterans Act) and how to access assistance in receiving priority service.

Local 5-Year Plan Modification: The Board, with CEO approval, must modify the local five-year plan to incorporate veterans' priority provisions, in accordance with previous planning instructions contained in WIA Technical Assistance and Information Letter No. 99-6 (Services to Special Populations section of the Plan).

VII. INQUIRIES:

Inquires regarding this Veteran Program Letter should be made to the State Veteran's Coordinator, Veterans Unit, Job Service Bureau, Department of Workforce Development, 201 E. Washington Ave., Room G-200, PO Box 7972, Madison, WI 53707.

VIII. EFFECTIVE DATE:

Immediately.

IX. EXPIRATION DATE:

Continuing.

ATTACHMENT N

Workforce Investment Act and Wagner-Peyser Act Performance Levels for PYs 2007 and 2008

Wisconsin

Workforce Investment Act Performance Levels

<u>Adult Measures</u>	<u>PY 2007</u>	<u>PY 2008</u>
Adult entered employment	76.00	78.00
Adult employment retention	84.00	86.00
Adult average six-month earnings	\$9,500.00	\$9,800.00
Adult employment and credential	66.30	67.70
<u>Dislocated Worker Measures</u>		
Dislocated worker entered employment	88.70	90.40
Dislocated worker employment retention	93.80	95.70
Dislocated worker average six-month earnings	\$14,175.00	\$14,400.00
Dislocated worker employment and credential	74.00	75.00
<u>Older Youth Measures</u>		
Older youth entered employment	75.50	77.00
Older youth employment retention	86.00	87.00
Older youth earnings change	\$4,552.00	\$4,575.00
Older youth credential	61.00	62.00
<u>Younger Youth Measures</u>		
Younger Youth Skill Attainment	92.00	94.00
Younger youth diploma	82.00	83.00
Younger youth retention	75.90	77.70
<u>Customer Satisfaction Measures</u>		
Participant ACSI	76.90	78.90
Employer ACSI	77.90	79.80

Wagner-Peyser Act Performance Levels

<u>Measures</u>	<u>PY 2007</u>	<u>PY 2008</u>
Entered employment	65.00	66.00
Employment retention	86.00	87.00
Average six-month earnings	\$13,500.00	\$13,800.00